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BEFORE THE ARIZONA CORPORATION COM

JIM IRVIN
CHAIRMAN
RENZ D. JENNINGS
COMMISSIONER
CARL J. KUNASEK
COMMISSIONER

IN THE MATTER OF THE COMPETITION
IN THE PROVISIONS OF ELECTRIC
SERVICES THROUGHOUT THE STATE
OF ARIZONA

E-010322-97-0774
DOCKET NO. U-0000-94-165
NOTICE OF FILING

Citizens Utilities Company hereby provides notice of filing of its Unbundled and Standard Offer Service Tariffs as required by the Commission's Order in the above-referenced docket.

RESPECTFULLY SUBMITTED this 31st day of December, 1997.

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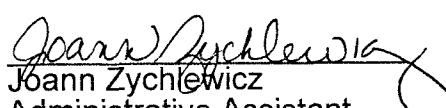
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TABLE OF CONTENTS

INTRODUCTION.....	1
EXECUTIVE SUMMARY.....	3
SECTION 1. TECHNICAL DESCRIPTION OF THE FILING.....	11
A. STANDARD OFFER BUNDLED SERVICE.....	11
B. UNBUNDLED TARIFFS.....	12
1. UNBUNDLED COST STUDY.....	12
a. Reclassify Valencia Production Facilities as Transmission Related.....	12
b. Improve the Labor Allocator.....	14
c. Revise Meter Allocator for LPS Class.....	15
d. Overview of the Cost of Service Study.....	15
e. Unbundled Costs Results.....	17
2. RATE DESIGN.....	19
a. Equalization of Rate of Return Among Rate Classes	20
b. Equalization of Mohave and Santa Cruz Rates.....	22
c. Establishing Rates at Costs to Serve.....	22
d. Phasing in Rate Initiatives.....	31
e. Rate Adjustments to Reflect Current Costs.....	34
SECTION 2. CUSTOMER SELECTION METHODS.....	36
A. SUMMARY OF SELECTION METHOD.....	36
1. CUSTOMER SELECTION BY CLASS.....	37
2. LOW-INCOME CUSTOMERS.....	40
3. GEOGRAPHIC SELECTION.....	40
4. RENEWABLE RESOURCES.....	40
5. OTHER SPECIAL SELECTION CRITERIA.....	41
6. THREE MW LIMITATION.....	41
7. SPECIAL CONTACTS.....	41
8. LOAD AGGREGATION.....	42
9. CUSTOMER SELECTION TIME PERIOD.....	42
10. DETERMINATION OF REQUIRED PERCENTAGES BEING MET.....	42
11. ESTIMATING PEAK LOAD.....	43
12. ADMINISTRATION OF THE SELECTION PROCESS.....	43
13. CONSUMER EDUCATION.....	43
SECTION 3. NEW COSTS UNDER COMPETITIVE INDUSTRY STRUCTURE	44
A. THE NATURE OF THE NEW COSTS.....	44
B. CITIZENS' PROPOSAL FOR RECOVERY OF NEW COMPETITIVE COSTS.....	47
SECTION 4. COMPETITIVE SERVICES PRICING.....	49
SECTION 5. NEED TO REVISE LINE EXTENSION POLICIES.....	50

ATTACHMENTS

TARIFF SCHEDULES FOR ELECTRIC SERVICES

COST-OF-SERVICE SCHEDULES:

SCHEDULE 1 -- COST OF SERVICE STUDY

SCHEDULE 2 -- UNBUNDLED COST DATA

SCHEDULE 3 -- RECONCILIATION OF REVENUE TARGETS
AND REVENUE PROOF

SCHEDULE 4 -- BILL COMPARISONS

SCHEDULE 5 -- WORKPAPERS

INTRODUCTION

Citizens Utilities Company ("Citizens") submits this filing to the Arizona Corporation Commission ("Commission") addressing Unbundled and Standard Offer Service Tariffs as required by the Commission's Order No. 59943 in Docket No. U-0000-94-165 ("Restructuring Order"), dated December 26, 1996. Citizens has done the needed analyses to unbundle the prices contained in its existing bundled rates and presents the results of these analyses in this filing. For Standard Offer services, Citizens' filing proposes modifications to its existing rate design and presents proposed tariffs for these services. Because the Commission's Working Group to define the details of the standards, procedures and protocols governing the unbundled electric services offered by Arizona Utilities has not yet completed its task, Citizens has not attempted to prepare and present formal tariffs for its unbundled services in this filing.

Citizens' filing consists of seven key sections:

- 1) Technical Description of Filing** which provides an overview of the Standard Offer tariffs and Unbundled prices and their derivations;
- 2) Customer Selection Procedure** responds to relevant requirements in A.A.C R14-2-1604, regarding the roll-out of unbundled rate offerings;
- 3) New Costs Under Competitive Industry Structure** broadly describes several new functions required of regulated distribution companies that arise as a result of the transition to and ongoing operations of the restructured Arizona electric industry;

4) Competitive Services Pricing discusses Citizens' potential participation in the currently regulated services slated to be opened to competition;

5) Need for Revisions to Line Extension Policies where Citizens seeks a Commission investigation of the adequacy of its line extension rates and policies;

6) Tariff Schedules for Standard Offer tariffs for all classes of customers proposed to be effective January 1, 1999;

7) Supporting Schedules which include:

- Schedule 1. Cost-of-Service Study;
- Schedule 2. Unbundled Cost Data;
- Schedule 3. Reconciliation of Revenue Targets and Revenue Proof;
- Schedule 4. Bill Comparisons; and
- Schedule 5. Workpapers.

EXECUTIVE SUMMARY

Through this filing, Citizens presents the results of its analyses for unbundling its electric rates for information purposes and seeks the Commission's approval for its Standard Offer tariffs for all rate classes. Citizens also presents its methods for selecting customers for participation in the Competitive Phases defined by the Restructuring Order. Finally, Citizens presents in this filing proposals for:

- adjusting Unbundled Rates to reflect current costs;
- recovering new costs under the competitive industry structure;
- pricing competitive services; and
- revising line extension policies.

Rate Design Concepts

The Unbundled and Standard Offer tariffs incorporate five key concepts:

1. Basing rates on Citizens' last rate case.

Citizens' rate studies for its Unbundled and Standard Offer rates reflect the costs and revenues approved by the Commission in Citizens' last rate case.

2. Equalizing rates of return among all rate classes.

Rates of return among rate classes range from -2.3 to 35% in current rates. Citizens proposes to equalize these returns to improve the fairness and equity of its rate structure.

3. Equalizing rates between Mohave and Santa Cruz Counties for residential and small commercial customers.

In Citizens' last rate case, the Commission generally supported the concept of removing the differences in electric prices between Mohave and Santa Cruz Counties. Tariffs other than residential and small

commercial have already been equalized; with this filing Citizens proposes to complete the equalization for both Unbundled and Standard Offer rates.

4. Basing rates on the costs to serve.

Under Citizens' existing rate design, most current rates include charges that under-collect customer- and demand-related costs and energy charges that are higher than the cost to serve. These result in unnecessary intra-class subsidization. Citizens proposes to remove these rate design anomalies.

5. Phasing in rate adjustments over four years to ease customer impacts.

Consistent with the Commission goal for an orderly transition to the new industry structure, Citizens proposes to implement its new Standard Offer and Unbundled rates in four equal steps over a four-year period.

Throughout this filing, Citizens has based its computations on the rate making procedures approved by the Commission in its recent fully litigated electric rate case.

Standard Offer Rates

Incorporating the above adjustments into the rate design results in the following Standard Offer rates over the four-year phase-in period (1999 - 2002): (next page)

**Standard Offer Rates
Four-Year Phase-in**

Billing Unit	Res'l Mohave	Res'l S. Cruz	SGS Mohave	SGS S. Cruz	LGS	IPS	69kV LPS	<69kV LPS	LTG**
Present Rates									
Cust. Chrg. \$/Mo	\$6.50	\$6.50	\$10.00	\$10.00	\$10.10	\$10.10	\$800.00	\$365.00	\$217,299
Energy, \$/kWh	\$0.0765	\$0.0809	\$0.076	\$0.120	\$0.0549	\$0.0549	\$0.025	\$0.025	
Demand, \$/kW					\$9.50	\$2.50	\$16.10	\$24.75	
Step 1, 1/1/99									
Cust. Chrg. \$/Mo	\$11.01	\$11.01	\$16.45	\$16.45	\$9.47	\$10.91	\$713.24	\$325.42	\$236,490
Energy, \$/kWh	\$0.0710	\$0.0743	\$0.070	\$0.103	\$0.0461	\$0.0461	\$0.0237	\$0.0237	\$0.0048
Demand, \$/kW					\$12.77	\$4.09	\$15.05	\$23.01	
Cumm. Increase*	0.41%	1.20%	2.48%	-9.59%	1.93%	-4.13%	-5.95%	-6.51%	13.01%
Step 2, 1/1/00									
Cust. Chrg. \$/Mo	\$15.52	\$15.52	\$22.89	\$22.89	\$8.84	\$11.73	\$626.48	\$285.83	\$292,062
Energy, \$/kWh	\$0.0655	\$0.0677	\$0.064	\$0.086	\$0.0373	\$0.0372	\$0.0223	\$0.0223	\$0.0096
Demand, \$/kW					\$16.04	\$5.68	\$14.00	\$21.27	
Cumm. Increase*	0.81%	2.39%	4.94%	-19.18%	3.86%	-8.42%	-12.09%	-13.14%	43.68%
Step 3, 1/1/01									
Cust. Chrg. \$/Mo	\$20.03	\$20.03	\$29.34	\$29.34	\$8.21	\$12.54	\$539.73	\$246.25	\$351,635
Energy, \$/kWh	\$0.0600	\$0.0611	\$0.058	\$0.069	\$0.0286	\$0.0284	\$0.0210	\$0.0210	\$0.0144
Demand, \$/kW					\$19.31	\$7.27	\$12.95	\$19.52	
Cumm. Increase*	\$1.22%	3.59%	7.41%	-28.77%	5.90%	-12.55%	-18.04%	-19.68%	74.35%
Step 4, 1/1/02									
Cust. Chrg. \$/Mo	\$24.53	\$24.53	\$35.78	\$35.78	\$7.58	\$13.35	\$452.97	\$206.67	\$409,207
Energy, \$/kWh	\$0.0546	\$0.0546	\$0.052	\$0.052	\$0.0198	\$0.0196	\$0.0196	\$0.0196	\$0.0192
Demand, \$/kW					\$22.58	\$8.86	\$11.90	\$17.78	
Cumm. Increase*	1.73%	4.88%	9.88%	-38.36%	7.83%	-16.68%	-24.18%	-26.30%	105.01%

Note: SGS=Small General Service; LGS=Large General Service; IPS=Interruptible Power Service;
LPS=Large Power Service; and LTG=Lighting Service

* Cumulative Increase reflects the rate change caused by shifting of revenue responsibility

** Lighting Service rates shown are revenue for entire rate class.

Citizens' proposal for adjusting the rate design for Standard offer rates improves the fairness, equity and economic efficiency of its rate structure, but results in only small increases for residential customers (which are further moderated by the four-year phase-in period). The Lighting Service revenue requirements shown above are for the entire rate class. Citizens proposes to file a detailed rate design for the Lighting Service class at a later time in this proceeding that addresses the pricing for individual fixtures and poles offered under the rate. In the process of preparing this filing, Citizens discovered that its pricing for small wattage fixtures is substantially lower than typically offered. Time restrictions did not permit the completion of a more thorough lighting analysis.

Citizens' unbundled rates reflect a Systems Benefits Charge ("SBC") that recovers DSM, renewable, and certain low-income costs approved in Citizens' last rate case. Costs for discounts under Citizens' existing CARES program are handled as they have been previously and are not included in the current SBC. Citizens proposes that CARES discounts should be included in the SBC and describes an alternative administration method for the program in the future. Citizens has proposed a change in the design of the CARES discount mechanism to conform with its new rate design proposals.

In addition to these changes in electric pricing, opening the industry to competition will also require changes in the rules and regulations governing electric service. Because there remain a number of unresolved issues concerning the final form and design of unbundled services, Citizens has not attempted in this filing to

update its Rules and Regulations. Citizens intends to make a filing that addresses all the necessary changes to its Rule and Regulations once issues surrounding unbundled electric services have been finalized and resolved.

Unbundled Rates

The following table provides the results of unbundling Citizens' existing rates into the Commission-specified cost categories. Two key elements are not included in these unbundled rates: (i) provision for stranded cost recovery; and (ii) the costs for new functions under the restructured industry. The table shows unbundled rates when fully phased-in (2002).

Unbundled Rates Fully Phased in - Step Four (exclusive of stranded cost charges and new function costs)

Price Comp.	Residential		Small General Service		Large General Service	Interr. Power Service	Large Power Service		Lighting Service*
	Mohave	S. Cruz	Mohave	S. Cruz			69 kV	<69 kV	
Transmission	3.02 \$/Mo	3.02 \$/Mo	3.70 \$/Mo	3.70 \$/Mo	1.25 \$/kW	0.67 \$/kW	1.71 \$/kW	1.10 \$/kW	0 \$/Mo
Distribution	17.05 \$/Mo	17.05 \$/Mo	24.52 \$/Mo	24.52 \$/Mo	10.73 \$/kW	2.50 \$/kW	0.27 \$/kW	6.76 \$/kW	29,455 \$/Mo
Metering \$/Mo	2.33	2.33	3.94	3.94	3.96	6.96	440.77	201.10	535
Billing \$/Mo	1.40	1.40	2.38	2.38	2.38	4.21	8.02	3.66	321
Cust. Info \$/Mo	0.14	0.14	0.24	0.24	0.24	0.42	0.80	0.36	32
Other \$/Mo	0.59	0.59	1.01	1.01	1.00	1.77	3.38	1.54	378,864
Total Cust Chrg. \$/Mo	24.53	24.53	35.79	35.79	7.58	13.35	452.97	206.67	409,207
System Ben. \$/kWh	.00062	.00062	.00058	.00058	.00061	.00039	.00041	.00041	NA

*Lighting Service rates shown are revenue for entire rate class.

The unbundled rates are designed to be revenue neutral compared to the current rates approved in Citizens' last rate case. When these rates go into effect, they will not likely recover Citizens' costs due to the age of the cost data, particularly in light of the implementation date of January 1999. Citizens suggests that the Commission develop a reasonable proxy adjustment to Citizens' unbundled rates that will account for the cost increases that occur in the period from the development of the rates until their time of implementation. Citizens suggests that the Consumer Price Index may be a reasonable proxy adjustment to use in lieu of a full-scale rate proceeding.

Customer Selection Methods

While Citizens favors a "flashcut" to competition over a phase-in process, the filing presents how Citizens would select customers for the Competitive Phases defined in the existing Restructuring Order. Citizens proposes to randomly select customers from each rate class for participation in the Competitive Phases. Implementation details, including how Citizens proposes to account for the special factors and considerations identified by the Working Group addressing this area, are provided in Section 2 of this filing.

New Costs Under the Competitive Industry Structure

Introducing competition in the supply of electricity will require changes and additions to the operations of the local distribution companies ("LDC") that will remain regulated. Because the structure and requirements of the restructured Arizona electric industry are not yet fully defined, the costs for these new functions cannot be accurately determined. Citizens' filing summarizes the types of new functions that will be required

and proposes a cooperative statewide effort to exploit economies of scale for establishing and implementing common processes and systems among the regulated operations of all Affected Utilities. In order to avoid economic disparities across the state, Citizens proposes that capital and one-time costs be pooled statewide and that a statewide, uniform recovery charge be established for the implementation costs of these new systems.

Pricing of Competitive Services

The rates and charges included in Citizens' filing for those services opened to competition by the Commission's Restructuring Order are those it proposes to charge as part of its obligations as a regulated LDC, for instance, as provider of last resort. If Citizens does in fact participate in the competitive marketplace for any of these services, its non-regulated pricing will likely be different from the regulated prices in this filing. Citizens recognizes it must implement complete accounting separation between its regulated and non-regulated operations.

Need to Revise Line Extension Policies

Citizens proposes that the Commission investigate, within the Unbundled Rates proceeding, the adequacy of its line extension rates and policies to remove existing cross-subsidies between existing and new customers. Citizens' initial studies indicate existing customers effectively subsidize new customers because line extension policies are not sufficient to cover the marginal costs imposed by new customers coming onto its system. Citizens seeks acknowledgment from the Commission that this issue should

be addressed within this proceeding and intends to conduct the needed studies and introduce specific proposals for altering its line extension policies and rates.

SECTION 1. TECHNICAL DESCRIPTION OF THE FILING

Citizens' filing presents its proposals for Unbundled and Standard Offer electric rates. Citizens bases its filing on the rate-making procedures authorized by the Commission in Citizens' last electric rate case (Docket No. E-1032-95-433, Decision No. 59951, dated January 3, 1997). Both the Standard Offer and the Unbundled Rates attempt to equalize returns among the rate classes and equalize residential and small commercial customer rates in Mohave County and Santa Cruz County service areas. Citizens proposes a full four-year phase-in to minimize the effect of these changes. Citizens also proposes a method for adjusting rates to account for the time lag between the test year, which ended March 1995, and the implementation of these rates in January 1999, nearly four years later.

A. Standard Offer Bundled Services

Citizens' proposed rates for Standard Offer Bundled Service will not increase revenues over those provided by its existing rates. Citizens does however seek Commission approval of certain modifications to both its bundled and unbundled rates. Specifically, Citizens proposes to equalize the rates of return for its various rate classifications and to equalize Mohave and Santa Cruz Residential and Small Commercial rates, all in the same manner as described below for unbundled rates. These changes to its Standard Offer tariffs would be phased-in over the four-year period 1999-2002. Tariff schedules for the first phase of the Standard Offer services are included in this filing.

B. Unbundled Rates

1. Unbundled Cost Study

Citizens' rates must be based on the underlying costs to serve. As such, Citizens' first step was to perform an unbundled class Cost of Service Study ("COSS") to reflect the costs approved by the Commission in Decision No. 59951, dated January 3, 1997, Citizens' recently completed general rate case. The COSS used in that case to develop bundled rates did not focus on the underlying costs to serve customer classes on a functional basis. Consequently, Citizens reviewed the COSS to determine if its methods would materially distort the functional costs to serve its customers in an unbundled environment. Although Citizens identified several improvements to the COSS model, we focused on only material improvements to minimize contentious issues. Three changes to the COSS were incorporated:

- a. The Valencia production facilities were reclassified as transmission-related;
- b. The labor allocator was improved; and
- c. The meter allocator for Large Power Service class was revised.

Each of these changes is addressed below followed by an overview of the COSS performed for this filing. Finally, the results are discussed.

a. Reclassify Valencia Production Facilities as Transmission-Related

Citizens' current cost of service includes the costs for generation facilities located in Nogales, Arizona. The Valencia plant's units, nominally rated at 55 MW, have relatively high running costs and are seldom dispatched solely to provide energy.

Normal dispatch control of these facilities is performed by Arizona Public Service ("APS"), under Citizens' full-requirements power supply agreement with APS, for which Citizens receives capacity credits. While normal dispatch control falls to APS, under critical conditions, Citizens retains priority control to operate these facilities.

Critical conditions include:

- 1) There is a failure in the single, 70-mile Western Area Power Administration ("WAPA") 115 kV transmission line running from the Del Bac substation to the Apache substation;
- 2) WAPA is experiencing difficulty in maintaining nominal voltage levels on its transmission system; or
- 3) Citizens experiences difficulty with its 55-mile long 115 kV radial transmission line running from the Nogales tap on WAPA's line to the Valencia plant.

The Valencia production facilities thus serve as the single-contingency resource and provide voltage support to the Santa Cruz area.

Because of the critical reliability support provided by the Nogales generation and the Commission's emphasis on reliability preservation throughout the restructuring process, Citizens has classified the costs for these facilities as transmission-related. The costs are included within the unbundled transmission service component because the standby power and voltage support functions are required to support and back-up the existing transmission system for all customers regardless of their source of energy supply.

b. Improvement of the Labor Allocator

In cost-of-service studies, allocators are used to allocate costs between rate classes. The allocator affects the assignment of allowed costs to customer classes and to cost functions. In the previous rate case, Citizens' COSS employed a labor allocator to assign several categories of administrative and general ("A&G") expenses. The allocator included minor amounts of materials and supplies expenses as well as pure labor expenses and did not include test-year labor costs for construction in its development.

If the same allocation approach were adopted in this filing, costs included in A&G expenses would not be accurately allocated between the production, transmission and distribution functions, a matter that was of little concern in the previous rate case's development of bundled rates. Citizens' unbundled filing incorporates an improved labor allocator that: 1) allocates supervision and engineering labor on the subtotal of the labor being supervised, exclusive of other expenses; and 2) adds capitalized labor to the labor allocator. Since most capitalized labor is related to the distribution function, this latter change insures that the labor allocator properly reflects test-year labor costs by plant function.

c. Revised Meter Allocator for LPS Class

Citizens' COSS attempts to retain all of the methods and procedures reviewed and accepted in Citizens' last rate filing. However, in reviewing the initial functional cost study results, the indicated customer costs for the LPS class were found to be a small fraction of the rates currently in place. The current monthly customer charge ranges from \$365 per month to \$800, depending on the voltage of service provided. Citizens' initial COSS for this filing indicated costs under \$20 per month, which signaled a problem.

The problem was traced to the customer allocator used to assign meter investment to customer classes. The initial study used a simple weighing factor to develop a single allocator for all customer-related costs. For the LPS class, whose customers each have loads exceeding 1 megawatt, this simplification resulted in the assignment of less than \$100 per meter. In actual practice, metering investment for very large customers typically runs from \$2,000 to \$20,000. To alleviate this problem, the meter allocation factor was revised for this filing to reflect a cost of approximately \$8,000 per customer.

d. Overview of the Cost of Service Study

Citizens Utilities Company retained Management Applications Consulting ("MAC") to perform a COSS capable of supporting functionally unbundled rates. MAC is a management consulting firm specializing in cost of service and rate design issues associated with regulated utilities. MAC has assisted dozens of utilities across the United States in performing cost of service studies and designing rates. In the last few

years, MAC has evolved its cost of service techniques to provide cost of service information to assist gas and electric utilities in preparing for a competitive energy supply market. MAC's assignment was divided into four sequential tasks:

1. Replicate the COSS filed in Citizens' last rate case using MAC's proprietary cost-of-service model.
2. Revise the COSS to comply with the ACC order in the case.
3. Revise the COSS methods to the extent necessary to assure reasonable estimates of the functionally unbundled costs to serve each customer class.
4. Produce total and unit cost information at a sufficient level of detail to meet the Commission's filing requirements and design appropriate cost-based rates.

The results of MAC's efforts are shown on Schedule 1, the Cost-of-Service Study. Each page shows information for Citizens as a whole, as well as allocated costs to each of the six rate classes. The layout of the COSS is summarized on the following table:

<u>Page No.</u>	<u>Description</u>
1-2	Summary of results at present rates - displays the rate base, revenues before the rate relief granted, and allowed expenses in accordance with the Commission's order for the twelve month period ending March 31, 1995, as adjusted.
3-5	Rate base - details the original cost, depreciation reserve, deferred taxes and working capital necessary to develop rate base.
6	Operating revenues - displays base rate and PPFA revenues, as well as other operating revenues by class.
7-9	Operating expenses - indicates the operating expenses incurred for production, transmission, distribution, customer accounting, customer service, sales and administrative and general expenses.

- 10-12 **Test year labor expenses** - shows a subset of the labor costs included on pages 7-9, as well as capitalized labor, totaled to form the Labor allocator for subsequent use in allocating some administrative and general expenses.
- 13-14 **Other operating expenses** - shows the development and allocation of depreciation expense, taxes other than income, and income taxes.
- 15-16 **Revenue requirements** - shows revenues and unit costs under present rates and under hypothetical rates which exactly equal the cost to serve each class when providing uniform rates of return.
- 17-22 **Allocation factor table** - shows each allocation factor used in the COSS.
- 23-28 **Allocation factor ratio table** - provides similar information to the allocation factor table restating each line so that the class entry represents its percentage share of the total company statistic.

The COSS has been carefully constructed to mirror the Commission's January 1997 rate order with regard to rate base, operating expenses, revenues, return and taxes. The approved rates placed in effect at the conclusion of the last rate case produce total revenues which differ slightly from those stated in the order. A booked-to-billed adjustment of less than 0.5% has been employed to match the rate design to booked revenue as has been done in the past. Schedule 3 shows the development of present revenues based on Commission-approved billing determinants and reconciles this figure with the rate order.

e. Unbundled Cost Results

To satisfy all potential unbundled rate design needs, MAC's model included fifteen discrete functional cost categories as follows:

- 1 Production Capacity
- 2 Production Energy
- 3 Transmission(including Valencia Production Plant)
- 4 Subtransmission
- 5 Distribution Primary
- 6 Distribution Secondary (Unused)
- 7 Distribution Transformers and Services
- 8 Metering and Meter Reading
- 9 Billing and Collection
- 10 Information Services
- 11 Other Customer Related Costs
- 12 System Benefits - Renewables
- 13 System Benefits - Environment (Unused)
- 14 System Benefits - DSM
- 15 System Benefits - Low Income

Two functional cost categories were not used. Citizens' plant records could not provide sufficient detail to segregate distribution plant into primary and secondary voltage categories. For this reason, all costs were assigned to the distribution primary function and the distribution secondary function was not used. Also, the "System Benefits - Environmental" function was not used because the test-year did not include any material costs for environmental matters.

MAC's cost model provides functional cost of service information at the same level of detail provided for the total company. In other words, separate cost of service studies can be produced for each of the thirteen functional cost categories. For example, MAC could produce a cost of service report similar to Schedule 1 showing only production capacity costs for each class of service or any of the 13 functional categories. Rather than providing reports at this level of detail, the functional cost studies are summarized on Schedule 2, Unbundled Cost Data. This eight-page

schedule displays four pages of functional cost information at present rates and similar results if rates were set to generate equalized rates of return by class. Page one and five display total costs to serve by function and class. Pages two and six show the same revenue requirement stated on a per-unit basis of cents-per-kilowatt-hour of sales. Pages three and seven show functional cost responsibilities by rate class on a per unit demand cost basis of dollars-per-kW of billing demand. For the residential and small general service classes, billing demands are not available and unit costs are shown as zero. Pages four and eight show functional costs by class on a dollar per month per customer basis. Schedule 2 provides all the information necessary to design unbundled rates.

2. Rate Design

Citizen's rate design has been carefully formulated with five objectives in mind:

- (1) equalizing the rates of return among classes thereby eliminating inter-class subsidization;
- (2) equalizing rates between Mohave and Santa Cruz Counties for residential and small general service (all other rates having already been equalized);
- (3) establishing rates at their underlying costs to serve;
- (4) avoiding potentially disruptive rate changes by phasing in rate initiatives over a four-year period; and
- (5) implementing rate adjustments to reflect current costs.

Each of these objectives is addressed in turn below:

a. Equalization of Rate of Return Among Rate Classes

While Citizens' existing rates were set to provide an approved level of return on the overall net rate base, the structure of Citizens' rates results in a wide disparity among the rates of return provided by individual rates classes. Under Citizens' current rate structure, using the adjusted class COSS from the last case, the rates of return from the various rate classes are as follows (9.60% overall authorized rate of return):

Residential	8.43%
Small General Commercial	20.99%
Large General Service	6.55%
Large Power Service	34.80%
Interruptible Power Service	27.11%
Lighting Service	- 2.27%

This disparity should be corrected to promote fairness and equity within Citizens' service areas. While equity suggests that the rates established for all classes should generate identical rates of return, rate stability and predictability concerns dictate that increases resulting from the proposed rates should be moderated to avoid potentially disruptive pricing impacts. Consequently, as part of this filing, Citizens is proposing a four-year phase-in (1999 - 2002) for its unbundled rates to moderate the pricing impact from this shift in revenue responsibility and still ensure sound price signals when full retail choice is offered. In general, the proposed rates will shift revenue requirements from small commercial and industrial customers to large commercial, lighting, and, to a lesser extent, residential customers.

The results of this shift are displayed on pages 15 and 16 of Schedule 1. In particular, lines 12 - 25 of page 15 show the revenue requirements of each class at equalized rates return, the case where inter-class subsidization is completely eliminated. The data on page 16 show the revenues produced by present rates. A portion of the data from these two pages is tabulated below for ready reference and comparison:

Summary of Class Revenue Requirements				
Rate Class		Present Revenues	Revenues at equalized ROR	Percent Change
1	Residential	\$37,491,956	\$38,451,411	2.56%
2	Small General Service	\$4,847,544	\$4,038,719	(16.68)%
3	Large General Service	\$29,250,010	\$31,427,594	7.44%
4	Large Power Service	\$8,988,394	\$6,627,375	(26.27)%
5	Interruptible Power Service	\$1,146,931	\$953,779	(16.84)%
6	Lighting Service	\$216,294	\$440,252	103.54%
7	Total Company	\$81,939,130	\$81,939,130	0.00%

Source: Schedule 1, pages 15-16.

As can be seen from the table above, Citizens' proposal to correct the inequality in return among rate classes would result in only a 2.6% increase in the average rates now paid by residential customers. However, even this small increase is overstated, since competition in the supply of electricity is expected to result in lower generation costs for consumers. Given that Citizens' existing rates reflect an average production

costs of approximately \$.054/kWh, an energy savings of only 4% would completely offset the average impact on residential customers resulting from this shift in revenue responsibility. In view of these relatively small impacts, the fact that rates would be phased-in over a four-year period under this proposal, and the significant benefits of improved fairness and equity that would result from this change, Citizens fully supports making these adjustments as a part of this filing.

b. Equalization of Mohave and Santa Cruz Rates

As part of the implementation of unbundled service rates, Citizens is proposing in this application to fully equalize rates between Mohave and Santa Cruz Counties. This equalization would apply to both Residential and Small General Service rate classifications, eliminating the last vestiges of locational pricing from Citizens' tariffs. Equalization of Mohave and Santa Cruz rates was supported in concept by the Commission in its Decision in Citizens' last rate case. (Docket No. E-1032-95-433, Decision No. 59951, dated January 3, 1997) The proposed rate changes result in some relatively small increases to the residential and small commercial customers in Mohave County and decreases for these groups in Santa Cruz. To minimize the potential impact, Citizens proposes a four-year phase-in.

c. Establishing Rates at Costs to Serve

Citizens' bundled rate schedules are two-part, or, in the case of larger demand-metered customers, three-part rates. With the exception of the Large Power Service rate, current rate design employs customer and demand charges which are lower than the underlying costs to serve, but energy charges that are higher than costs to serve.

As the industry approaches competition, it is not enough to simply restate rates to separate the energy supply costs to facilitate competition in the production market place; the structure of regulated rates should also be revised to more accurately reflect costs to serve. This position is consistent with the Commission's statement in Docket No. U-0000-94-165, Decision No. 59943. Section R14-2-1606 G2 states that rates for unbundled services "*shall reflect the costs of providing the services.*"

Toward this end, Citizens proposes that customer charges should equal customer costs, energy charges should equal energy costs and demand charges should equal demand costs. For those small customers in the residential and small general services categories where demand metering is impractical, Citizens proposes that the customer charge recover both customer and non-production demand costs. For Standard Offer tariffs, the energy charge is set to recover production demand and energy costs to recognize that both production demand and energy costs are variable by month under the current supply contract with Arizona Public Service (APS). Under this approach, the Commission can be assured that intraclass subsidization will be minimized.

One of the guiding principles in establishing utility rates in a regulated marketplace is to ensure that rates are economically efficient. Economists have shown that economic efficiency is maximized when prices are set at marginal costs. Furthermore, there is a body of research generally labeled as Pareto pricing or inverse elasticity pricing, which suggests that when prices cannot be set exactly equal to

marginal costs, pricing efficiency is maximized when the most elastic portions of the rate design are set at marginal costs and the least elastic portions are set to meet revenue requirements. Since customers tend to make consumption decisions based on the change in costs associated with that decision, the tail block variable portion of utility rates generally controls consumption decisions.

While Citizens does not have a current marginal cost study, a review of marginal cost studies performed for other utilities indicates that Citizens' current customer charge is far below typical marginal costs to serve. Conversely, there is a general consensus in the industry that marginal energy costs are substantially below current, fully unbundled production costs. Thus, economic efficiency is enhanced when customer charges are increased and variable charges are reduced toward the level of marginal costs. Citizens proposes to do just this in its unbundled rate design.

Citizens also believes that, for smaller customers (those with two-part rates without a demand charge), the costs for transmission and distribution services facilities should properly be priced on a flat, rather than a volumetric basis as is the case under Citizens' current rates. Similar to the metering and other fixed costs typically recovered through the customer charge, Citizens' investment in distribution facilities is not subject to variation based on kWh consumption. In a restructured environment, these facilities in essence provide access for customers to competitively-price electricity. For small customers, the cost for this access varies little across the typical range of consumption. Citizens believes that access to the electricity markets should be priced analogously to the telephone industry where costs associated with switching systems, poles, lines, etc.

are recovered through flat monthly fees. Thus, Citizens' unbundled rate design reflects flat monthly fees for all non-production-related service components (except the Systems Benefits Charge) in its rates for residential and small commercial customers.

Two issues are raised if costs are correctly recovered in the customer charge instead of the energy charge. One issue is the potential impact on customers with very low consumption. The transition plan would nearly quadruple residential customer charges over four years, with a nearly comparable decrease in energy charges for the average customer. For customers with lower than average use, bills will be higher than under the current structure. Citizens notes that many of its low-income customers have low consumption levels and anticipates that the application of its CARES discount will help offset increases in these customers' charges. As part of the proposed changes to rates in this filing, Citizens is proposing to modify the structure of its CARES discount to apply a fixed amount against the customer charge, rather than apply the discount on a declining scale against the energy charges as it does currently. For those customers who have low use (vacant and seasonal housing are typical examples) who do not qualify for CARES, an alternative exists for these customers in the form of a solar or gas-powered generator. Those customers whose value of service is less than the monthly customer charge may choose these alternatives. However, those who remain will pay rates that more accurately reflect the costs to provide service and that are not subsidized by other customers.

A second issue may be that the lowering of the variable portion of the rate could encourage consumption and thereby discourage conservation efforts. Since the

proposed prices are moving toward economically-efficient, marginal cost-based prices, that implies that existing rates are economically inefficient and have discouraged consumption in the past. While Citizens supports and encourages conservation, it should not be implemented through the mis-pricing of energy services. Furthermore, as energy supply markets are deregulated, natural competition will automatically lower the variable portion of customers' bills. Thus mis-pricing of electric energy during this transition period would only delay the inevitable. Citizens' proposed rate design begins this process now and offers an orderly transition to the fully open marketplace anticipated in the year 2003.

Unbundled rates were designed for each rate class. First, unbundled costs from Schedule 2 were totaled into seven categories as follows:

- 1) Transmission
- 2) Distribution
- 3) Metering
- 4) Billing
- 5) Customer Information
- 6) Other Customer Related Costs
- 7) System Benefits

Each of these costs was then divided by the appropriate billing units to develop cost-based rates. This calculation is provided as Schedule 5 of the filing package. The table below shows the unbundled rates for each of Citizens' rate classifications when fully phased-in.

**Unbundled Rates
Fully Phased in - Step Four
(exclusive of stranded cost charges and new function costs)**

Price Comp.	Residential		Small General Service		Large General Service	Interr. Power Service	Large Power Service		Lighting Service*
	Mohave	S. Cruz	Mohave	S. Cruz			69 kV	<69 kV	
Transmission	3.02 \$/Mo	3.02 \$/Mo	3.70 \$/Mo	3.70 \$/Mo	1.25 \$/kW	0.67 \$/kW	1.71 \$/kW	1.10 \$/kW	0 \$/Mo
Distribution	17.05 \$/Mo	17.05 \$/Mo	24.52 \$/Mo	24.52 \$/Mo	10.73 \$/kW	2.50 \$/kW	0.27 \$/kW	6.76 \$/kW	29,455 \$/Mo
Metering \$/Mo	2.33	2.33	3.94	3.94	3.96	6.96	440.77	201.10	535
Billing \$/Mo	1.40	1.40	2.38	2.38	2.38	4.21	8.02	3.66	321
Cust. Info \$/Mo	0.14	0.14	0.24	0.24	0.24	0.42	0.80	0.36	32
Other \$/Mo	0.59	0.59	1.01	1.01	1.00	1.77	3.38	1.54	378,864
Total Cust Chrg. \$/Mo	24.53	24.53	35.79	35.79	7.58	13.35	452.97	206.67	409,207
System Ben. \$/Kwh	.00062	.00062	.00058	.00058	.00061	.00039	.00041	.00041	NA

*Lighting Service rates shown are revenue for entire rate class.

Source: Schedule 5, page 4.

Two key elements are not included in these unbundled rates. First, no provision has been made here for the anticipated recovery of unmitigated stranded costs. An additional cost category will need to be added to Citizens' tariffs when stranded cost recovery is resolved. Second, as discussed in Section 3, there will be costs for new functions required of local distribution companies (for instance, for accounting for energy and supply transactions among customers and multiple suppliers) that are not currently reflected in rates.

Citizens' proposed rates have been fully unbundled, separating transmission and distribution charges. In the past, transmission rates have been regulated by the Federal Energy Regulatory Commission ("FERC"). Bundled sales rates, which normally include transmission charges, have been traditionally regulated at the state level. Citizens' proposed rates have been designed to avoid any potential conflict between state and federal regulators and at the same time adhere to the Commission's mandate that unbundled rates be designed to be revenue neutral. Conceptually, the rate design begins with the quantification of total costs for transmission and distribution service currently in bundled rates. Next, a rate for transmission service alone is developed. The present transmission tariff was considered too onerous for existing retail customers since it is a point-to-point rate, it requires a minimum one-year contract term, it requires the establishment of a maximum contract demand, and it bills at the rate of \$15.60 per kW of annual contract.

The proposed rates avoid this problem. Using Citizens' FERC rate as a starting point, the unbundled transmission rate simply restates the FERC charges into the billing units used for distribution charges, either \$/kW of monthly billing demand or \$/month for customers without demand meters. This calculation is shown on Exhibit 5, pages 4, 10, and 18. Once an equivalent transmission rate is computed, the unbundled distribution rate is calculated residually for each class by subtracting the transmission rate from the totaled transmission and distribution costs. Thus, the total of the transmission and

distribution rates exactly equals the costs underlying present bundled sales tariffs and the rate for the transmission service alone generates approximately the same revenues as the current FERC tariff.

The costs associated with the Valencia Generating Station have been classified as transmission-related, as previously discussed. These costs were included in the total of transmission and distribution costs. At the present time, these production costs are not included in the FERC point-to-point transmission tariff, even though these costs could subsequently be considered Ancillary Transmission services and fall under FERC jurisdiction. Thus, recovery of these costs is currently included in the distribution rates. This is appropriate since reliable distribution deliveries cannot be effected without this capacity.

The Systems Benefit Charge ("SBC") has been set to recover amounts for DSM, renewables, and certain low-income activities approved in Citizens' last rate case. Citizens' CARES program, which provides bill discounts to eligible low-income customers, is not reflected in the SBC. To minimize contentious issues in this filing, Citizens has maintained the level of CARES funding and designed the recovery of CARES discounts to be funded equally by all classes of service. Citizens, however, favors a change in how the CARES program is funded and administered in the future. Citizens believes the CARES discount is properly funded as a component of its SBC and administered by a state-level agency with responsibilities related to providing low-income financial support. Citizens envisions that, under this new, more efficient and effective arrangement, it would provide funding for the CARES program to this agency

which in turn would administer the provision of the rate subsidies to its clients along with other benefits and in a manner that best serves the needs of the community. Citizens seeks acknowledgment from the Commission that this new arrangement is favorable and, if so acknowledged, will include the CARES discount in the calculation of the SBC in its compliance filing.

Another matter relating to the CARES program is a change in the design of the CARES tariff to accommodate the overall proposed changes in the residential rate structure. Currently the CARES discount is provided as a percentage reduction based on kWh usage levels. Because the re-designed residential rates recover a greater portion of costs through a flat (non-usage dependent) customer charge, the CARES percentage discount tied to usage level is no longer relevant. Instead, in order to keep the total amount of CARES discounts comparable to that provided by existing rates, the discount has been changed to a flat dollar-per-month discount (\$5.05) provided equally to all CARES customers.

Finally, the implementation of unbundled rates will require changes in a number of the rules and regulations now in effect. For instance, to the extent metering is established as a competitive service, metering standards and protocols will need to be added to Citizens' LDC Rules and Regulations. Because there remain a number of unresolved issues concerning the final form and design of unbundled services, Citizens has not attempted in this filing to prepare an updated set of Rules and Regulations. Once issues surrounding unbundled services have been resolved and finalized,

Citizens intends to file comprehensive new Rules and Regulations that address all the necessary changes needed to accommodate the new industry structure and operation.

d. Phasing in Rate Initiatives

The Commission has recognized that the transition to an unbundled energy supply marketplace will entail significant change in the industry and could potentially produce customer inconvenience, dissatisfaction or even disruption. Accordingly, the Commission has mandated a five-year calendar for making an orderly transition from bundled to unbundled services. Consistent with this mandate, to provide for an orderly transition to fully unbundled rates and to advise customers of both the magnitude and direction of future rate changes, Citizens proposes that standard offer and unbundled rates be revised annually on January 1st for four years beginning in 1999, in accordance with the rates tabulated on Schedule 5, pages 3 and 12, respectively.

With one exception (the lighting class, which will be discussed below) Citizens proposes moving from present rates to fully cost-based rates in four equal steps to reach full scale implementation of unbundled rates on January 1, 2002. As an example, the current residential customer charge is \$6.50 per month. At the end of the proposed four-year transition period, Citizens has proposed establishing customer charges at the full underlying customer-related cost to serve of \$24.53 per month, an increase of \$18.03 per month. In each of the next four years, the customer charge will be increased 25 percent of the way toward the full cost-based rate. In a similar

manner, the present energy charge exceeds the unit cost of energy and demand costs combined. Energy costs will be reduced in four equal steps to reach the targeted cost to serve.

In the case of lighting service, the cost-based rate is almost twice the existing lighting rate. Since many lighting customers are municipalities, customer budgeting and operational practices may require more lengthy notice in order to adapt to changing lighting costs. For this class, Citizens proposes that the initial rate design move only 10% of the way toward fully cost-based rates in the first year of the transition plan. In each of the following three years, rates will be moved 30% toward full cost-based rates. With adequate notice, lighting customers should be able to plan for these latter year increases. As a result of this special treatment for the lighting class, Citizens' proposed rates will only become revenue neutral in the fourth year of the transition plan. In the first, second and third years Citizens will see a revenue deficiency of approximately .06% of total revenues.

In its analysis of its Lighting Service tariffs, Citizens determined that certain anomalies in the pricing of individual fixtures exist in the current rate. Citizens has presented here only the change in the overall revenue requirements for the rate class. For completeness, filed lighting rates are designed using percentage multipliers. Citizens intends to file during this proceeding a more detailed lighting rate design study that will tie to the overall revenue levels identified here, but will likely modify the individual prices of fixtures and poles.

The total average impact on each rate class is shown on Schedule 4, page 1. However, the impact on typical customers could vary considerably from class averages. Schedule 4, page 2 provides typical bill analysis under current and proposed rates for the first year of the four-year transition plan. With the exception of lighting customers, this same impact would be repeated in years two, three and four of the transition plan. In the case of the lighting class, the impact in years two, three and four would be three times that shown in year one, since the transition plan moved only 10% toward full cost-based rates in the first year and 30% more each of the next three years. Since customers enlisting to take unbundled services would be purchasing their energy supplies in a competitive market, energy prices are expected to be lower than the unbundled production costs they are currently paying. Other unbundling experiments have suggested that a 10% reduction in energy costs is typical. These savings would overshadow the minor increases in transmission and distribution rates that would be assigned to some classes. Finally, the total flat charge in proposed residential rates, \$24.53 per month, is comparable to flat charges paid for other services like local telephone, cable and satellite television, and Internet services.

One outcome of the new rate design is a decrease in the demand charges of the LPS rate and an increase of demand charges in the LGS rate. Under the present tariffs, customers with loads between 500 kW and 1 MW may elect either the LPS or LGS tariff. In order to avoid large revenue swings from rate conversions by low-load-factor customers, Citizens' proposed Standard Offer tariffs remove the option for these large customers to select one tariff over another. Schedule 4, page 4 shows that these

large customers currently served on the LGS rate would receive an average decrease of 10% while the class as a whole is receiving a 7% increase. If these customers were allowed to migrate to the LPS rate, the additional reduction afforded these customers of approximately \$600,000 annually would require other rates to rise to offset this revenue erosion. Customers under 1 MW will remain on LGS, unless they selected LPS before December 31, 1997.

e. Rate Adjustments to Reflect Current Costs

The above cost analysis and rate design procedures set forth Citizens' proposal for how unbundled rates should be established. However, these rates likely will not fully recover Citizens' costs because of the age of the cost data underlying the rate calculations (test-year of 4/1/94 - 3/31/95) and the fact that the filed rates would not be effective until 1/1/99 (and perhaps beyond). Citizens does not intend to escalate this filing into a full-scale rate proceeding, however, it is reasonable for the Commission to allow an adjustment to its unbundled rates to bring them in line with current costs. In the intervening years between the original test year and the anticipated 1999 effective date of rates, inflation will increase Citizens' operating expense and the cost of plant investments needed to meet customer needs. While only a protracted rate proceeding could determine actual cost increases in detail, Citizens suggests one reasonable proxy adjustment to reflect these higher costs would be the Consumer Price Index (CPI). Citizens proposes that the Commission consider in this case a mechanism that would allow an adjustment to its unbundled rates (as derived from its rates effective 1/1/97) to bring them current with the actual date of introduction of open access. The unbundled

prices as presented herein are based on revenue levels approved in Citizens' last case and do not reflect any adjustment.

SECTION 2. CUSTOMER SELECTION METHODS

In its December 26, 1996, Restructuring Order, the Commission requires that Affected Utilities "shall propose for Commission review and approval how customer will be selected for participation in the competitive market prior to 2003." Citizens was a participant in the Working Group on customer selection methods and is among the participants who support a "flash-cut" to competition over a phase-in process. Such a flash cut would in general obviate the need for customer selection. Citizens understands that the Commission has re-opened the Rule on electric restructuring to consider changes and may in fact re-examine the phase-in process as a result. The following proposal is presented under the assumption that no changes are made to the phase-in process as currently set forth in the Restructuring Order.

A. Summary Of Selection Method

Citizens proposes to select customers for participation in the competitive market using a random selection of customers selected from each customer class. Citizens originally supported an alternative method within the working group process, but has reconsidered its position after reviewing the findings of the working group. In particular, Citizens is persuaded that random selection of customers can offer the best view of the actual mechanics and benefits of competition, is fair since all customers have an equal opportunity to participate, and will ensure that a broad range of customer demand levels are represented.

The customer selection working group identified a number of factors and considerations that needed to be taken into account in the customer selection process, including:

- Customer selection by class
- Low-income customers
- Geographic selection
- Renewable resources
- Other special selection criteria
- Three MW limitation
- Special contracts
- Load aggregation
- Customer selection time period
- Determination of percentages being met
- Estimation of peak load
- Administration of the selection process, and
- Consumer education.

Each of these areas is now addressed in turn.

1. Customer Selection by Class

The Commission's Restructuring Order sets forth the criteria for the number and class of customers to whom competitive generation supply is to be made available, based on Citizens' 1995 retail peak demand. Citizens' 1995 retail coincident peak demand was 246 MW. The residential class target demand will be set at 15% of the Eligible Demand. Customers with loads greater than 3 MW will be limited to no more than 50% of the Eligible Demand. All residential customers will be assumed to have the class average demand and so the number to be selected will be well-defined, as shown below. Based on the load research and cost allocation studies underlying Citizens' rate structure and other Company statistics, Citizens has established the following eligibility

values for residential customers and another for customers with loads greater than 3 MW for the 1999 and 2001 phases of the introduction of competition.

Year	Total Eligible Demand	Avg. Demand per Res'l Customer ¹	Eligible Demand for Res'l Cust. ²	No. of Eligible Res'l Customers	Eligible Demand for >3MW Cust. ³
1999	49.2 MW	2.37 kW	7.38 MW	3114	24.6MW
2001	123.0 MW	2.37 kW	36.90 MW	15570	61.5 MW

¹ Based on 49.1% demand allocation and 51,000 residential customers in 1995.

² 15% of Eligible Demand in 1999 and 30% in 2001 per ACC Restructuring Order.

³ Maximum of 50% of Eligible Demand in 1999 and 2001 per ACC Restructuring Order

For non-residential customers, Citizens will use demand allocation and demand coincidence data from its cost study for the rate case approved in 1997 to identify non-coincident demand target levels for each non-residential rate class: Large Power Service ("LPS"), Interruptible Power Service ("IPS"), Large General Service ("LGS"), Small General Service ("SGS"), and Dusk-to-Dawn Lighting Service ("LTG"). As shown in the table below, the nonresidential classes have a demand allocation of 50.9% of the total demand. Of this total, 74.2% of the nonresidential demand is allocated to LGS customers, 14.4% to LPS customers, etc. The portion of the nonresidential Eligible Demand (41.8 MW in total) allocated to each nonresidential class is shown in the "MW" column in the table. Finally, these values are divided by the coincidence factors to arrive at the Non-coincident Customer Demands. A coincidence factor is the ratio of a rate class' contribution to the system coincident peak to the sum of the individual peaks of all the members of the rate class. Through these coincidence factors, the total 1999 non-residential Eligible Demand of 41.8 MW translates to 83.5 MW of non-coincident demand.

Actual August bills (from the relevant year) will be the basis for customer selection. The demand target shown in the table below for each non-residential rate class represents the total billing demand that will be randomly selected. The demand contribution toward the target made by the selected customers will be the metered demand for LPS, IPS, and LGS customers, the non-coincident demand implied by their energy consumption at the class average load factor for SGS customers, and the rated wattage for LTG customers. For selection purposes, the SGS and LTG customers will be grouped together.

1999 Non-coincident Demand Target Levels for Non-Residential Customers

1995 Peak: 246 MW

1999 Eligible Demand: 49.2MW

1999 Non-Residential Eligible Demand: 41.8 MW

Rate Class	Demand Allocation			Coincidence Factor (%)	Non-coincident Customer Demand MW Target* (E)= (C)/(D)
	% Total (A)	% Non-Res (B)	MW (C)=(B)* 41.8		
LPS	7.3	14.4	6.0	91	6.6
LGS	37.8	74.2	31.0	45	68.9
SGS+LTG	4.5	8.8	3.7	54	6.9
IPS	1.3	2.6	1.1	na	1.1
TOTAL	50.9	100.0	41.8		83.5

* The actual demands for the selected non-residential customers will sum to at least the total value of 83.5. The demand levels for each class will target the indicated levels, but may vary since randomly selected customers within a class are unlikely to sum exactly to the target.

2. Low-Income Customers

Under Citizens' customer selection method, low-income customers will be selected for open access as part of the overall process for selecting residential customers. Citizens supports the use of special outreach efforts targeted to low-income customers to help ensure their participation. Citizens intends to work with those low-income advocacy agencies with which it now has a working relationship to develop a focused communications plan for this group of customers.

3. Geographic Selection

No special provisions for geographic selection of customers are proposed by Citizens, other than to ensure proportionate selection in the Mohave and Santa Cruz service areas.

4. Renewable Resources

Consistent with the current Restructuring Order, Citizens proposes to make open access available to any customer who produces or purchases 10% or more of its annual electrical needs from photovoltaic or solar thermal resources located in Arizona after January 1, 1997. Citizens interprets this requirement to mean that the solar resources would be available on January 1, 1999, or contracted for delivery beginning on or before that date. To be eligible the customer must continue to receive 10% of their electrical needs from solar resources.

5. Other Special Selection Criteria

Citizens does not propose any special selection criteria beyond what is set forth in the current Restructuring Order.

6. Three MW Limitation

In general, Citizens' proposed selection process considers a customer load to be per account (or meter). Under Citizens' proposal, multiple customers may aggregate their loads once the selection process has determined which accounts are eligible for open access. A customer with multiple accounts may also aggregate his or her accounts, but only to the extent the individual accounts to be aggregated have been selected for open access eligibility. In other words, selection of a single account of a customer with multiple accounts does not automatically make all of the customer's accounts eligible for open access. The three MW limitation in the Restructuring Order will be applicable to aggregated loads exceeding 3 MW. Citizens will give priority to accounts which individually exceed 3 MW (i.e. non-aggregated loads) in making a determination on which loads exceeding 3 MW may not be provided open access due to the Order's limitation. If customer facility expansion causes the customer's load to exceed 3 MW, additional load will not be subject to the 3 MW limitation; that is, eligibility will be determined by existing load as of a certain date.

7. Special Contracts

Under Citizens' customer selection proposal, a customer on a special contract can participate in the competitive market before expiration of its contract only if both parties agree. To the extent a special contract expires after a selection cutoff date, but

before the date of full competition, that customer will be eligible for potential selection at the next customer selection phase.

8. Load Aggregation

Under Citizens' proposal, load aggregation would be allowed after customer selection is complete. Self-aggregation of loads would be allowed only to the extent that multiple accounts of the same customer were selected. Citizens believes all load aggregators should be registered with the State and be required to meet certain minimum qualifications as a condition of doing business in Arizona.

9. Customer Selection Time Period

Citizens believes that the customer selection process should begin as soon as possible after the Commission has approved Citizens' filings on customer selection plans, stranded cost charges, unbundled rates and system benefits charges. Citizens supports a minimum time period (e.g. 3 or 6 months) for customer education before initiating open access.

10. Determination of Required Percentages Being Met

Citizens proposes that a customer be deemed part of the competitive market when that customer has been offered the opportunity to choose suppliers. Customers who choose to continue receiving service from Citizens, either under a Standard Offer or special rate, should be considered as participating in the competitive market.

11. Estimating Peak Load

Citizens' proposal determines peak load using historical class average coincident peak demand as suggested by the Order and the Working Group Report on Customer Selection.

12. Administration of the Selection Process

Citizens proposes that Citizens' LDC administer the selection process.

13. Consumer Education

Citizens plans to provide informational material to selected customers in order to allow a cost-effective targeting of information to customers who have the most need for the information. Citizens strongly believes that 3-6 months should be provided for this education process.

SECTION 3. NEW COSTS UNDER COMPETITIVE INDUSTRY STRUCTURE

Introducing competition in the supply of electricity fundamentally changes the structure of the industry, not only to the extent that it creates new competitive enterprise, but also that it changes the operations of those components that will remain regulated. For instance, continuous tracking, accounting, and reconciliation of energy supply and demand transactions between distribution customers and tens, possibly hundreds, of electricity suppliers requires the implementation and operation of new systems by local distribution companies ("LDC"s) that are not currently needed in their businesses. Educating customers about how the industry is changing and how these changes affect the way they will purchase electricity is another example of a significant new activity that will fall to the LDC to undertake. The costs for start-up and on-going operation of these functions are not currently reflected in the rates of any Arizona LDC, nor can any Arizona LDC accurately determine these costs at this time given that the structure and requirements of the restructured industry have not yet been fully defined.

A. The Nature Of The New Costs

At this time, it is not possible to determine with any certainty the exact nature, or the magnitude, of the new costs that LDCs will bear under the restructured industry. This is so because the full structure, requirements, and procedures under open access are still in flux. The ACC working group process conducted during 1997 succeeded in identifying and clarifying many issues and options associated with unbundled services and the operation of competitive industry, but at this time, the "rules of the game" are

not finalized. For purposes of illustration, Citizens has identified four areas where new LDC functions will likely require new investments and on-going operating expense: 1) Energy Supply and Demand Transactions; 2) Communication and Education; 3) Operational Processes; and 4) Regulation. The type of activities that fall under these areas are:

Energy Supply and Demand Transactions

- Load Profiling - Establishing, maintaining, and on-going monitoring of generic load profiles needed in lieu of upgrading existing metering equipment with recording demand meters for the bulk of residential and small commercial customers wishing to purchase their energy supplies competitively;
- Supplier Deliveries and Load Settlement - Aggregating and reconciling metered and profiled customer loads with supply deliveries and reconciling metered deliveries with multiple supplier contracts. Monitoring and accounting for load balancing and other ancillary services.
- Supplier Revenue Accounting, Billing, and Remission - Computing daily and monthly balancing charges, remitting/receiving payments, assigning uncollectible accounts, providing billing cycle reports, and maintaining records of customer transfers for multiple suppliers.
- Supplier Monitoring and Regulatory Reporting - Monitoring supplier performance and providing regular reports to State and Federal regulatory authorities.

Communication and Education

- Communication Plan Development - Conducting market research and planning media communications, community outreach, and communications infrastructure needs.
- Customer Education - Implementing and monitoring media communications, collateral material development and distribution, Internet sites, community public relations activities, telephone hot lines, and customer seminars.
- Employee Education - Training for employees to understand the new industry structure, dealing with new customer/supplier transactions, new operating procedures, and handling customer inquiries.

Operational Processes

- Billing and Revenue Accounting - Modifying to computer systems for billing and revenue accounting, and customer information, and creating new bill forms to accommodate unbundled services. Associated employee training .
- Cost Accounting - Modifying computer systems for plant and expense accounting to accommodate unbundled services and related employee training.
- Increased Customer Inquiries - Telecommunications and personnel costs for handling anticipated increases in customer inquiries and increased volume and complexity in dispute resolution procedures.

Regulation

- Required Filings - Legal and expert support, as well as administrative costs for regulatory filings required under competitive restructuring.
- Pilot Programs - Obtaining regulatory approval, developing, and implementing pilot programs as appropriate to gain experience and design systems and procedures to effectively handle new business processes brought on by restructuring.

Once the full requirements of the restructured industry have been defined, Citizens will be able to estimate these costs. It is clear however that the regulated operations of virtually all Affected Utilities will face significant transition and on-going costs to accommodate the new industry structure. It is important that the Commission not discourage innovative mechanisms for minimizing and recovering these costs. One such proposal for how this could be done is presented in the following section.

B. Citizens' Proposal for Recovery of New Competitive Costs

Citizens proposes that the Commission put in place a statewide process to take advantage of economies of scale and achieve uniformity across the state for the recovery of the new LDC costs associated with the transition to a competitive electric industry in Arizona. As the industry scrambles to gear itself up for open access, each Affected Utility will be charged with implementing new systems to handle a set of new LDC functions that are largely common to each company. Each utility must put in place and operate the most effective and economical systems to handle such new functions as load profiling, customer education, and other new activities. Because of the commonality of these new LDC functions and the potential for economies of scale, a cooperative statewide effort to establish common processes and group buying should result in significant savings compared to each utility independently putting these new systems in place. Further, there will be significant capital costs and one-time expenses for establishing these new systems that will not necessarily vary in proportion to the size of each utility. Consequently, the rate effect of these new costs will likely depend on the size of the Affected Utility. For instance, the capital and one-time costs to establish load profiling capability will likely be similar for APS or Citizens. But, Citizens has far fewer customers over which to spread these costs.

Citizens proposes that, once the rules and requirements for open access have been fully defined, the Commission:

1. Establish a task group with representatives from each Affected Utility charged with the responsibility of identifying the new LDC systems and processes that can be standardized across the state and specifying their implementation;

2. Create a State-level fund for pooling the capital and one-time costs for implementation of these common systems by Affected Utilities; and
3. Establish a statewide uniform rate for recovery of these costs by Affected Utilities through a wires charge.

If possible, financing these costs using the State's bonding authority could help minimize financing costs and alleviate the complexity associated with accounting for the disparity of financing costs across the Affected Utilities. The recovery charge should be uniform across the State, but the recovery period could vary by utility depending on its allocated share of total costs.

In addition to LDC start-up costs for the transition to open access, there will also be on-going incremental operating expense for these new functions. These on-going costs should be borne by the new market entrants and consumers participating in the competitive electricity market who cause these costs.

SECTION 4. COMPETITIVE SERVICES PRICING

In its December 26, 1996, Restructuring Order, the Commission opens to competition "Any service...except Distribution Service and except services required by the Federal Energy Regulatory Commission to be monopoly services." In particular, certain services that are itemized in the Unbundled rates set forth in this filing, including metering and meter reading, billing and collections, and customer information services, are slated to become competitive services. The rates and charges included in Citizens' filing for these competitive services are those it proposes to charge as part of its obligations as a regulated LDC, for instance as provider of last resort. If Citizens does in fact participate in the competitive marketplace for these services, its non-regulated pricing will not likely be equivalent to the charges included in this filing for the competitive services. In this case, Citizens recognizes that it must implement complete accounting separation between its regulated and non-regulated operations.

SECTION 5. NEED TO REVISE LINE EXTENSION POLICIES

As Citizens prepares itself for the transition to the restructured industry, it has carefully reviewed its rates and policies to insure that there are no impediments to efficient operation within a more competitive marketplace. In particular, Citizens has attempted to remove from its rates cross-subsidies between groups of customers which undermine the fairness and equity of its rate structure. One area where such cross-subsidy can result in significant inequities is between new and existing customers. Because Citizens' existing line extension tariffs do not fully recover the incremental costs of new customer additions, existing customers effectively subsidize new customers. The Commission should investigate, within Citizens' Unbundled Rates proceeding, the adequacy of its line extension rates and policies.

Two potential areas of concern arise in the consideration of whether new electric customers are paying their equitable share of costs:

- (i) whether, given existing policies and rates for line extensions, and in particular, the length of line extension provided at no cost to customers, rates recover sufficient amounts to recoup the marginal cost of company-provided line extensions; and
- (ii) whether the marginal revenues provided by new customers coming onto the system cover the marginal costs associated with reinforcing upstream transmission and distribution facilities.

Citizens' initial studies indicate that in fact its rates are not sufficient to cover these marginal costs imposed by new customers coming onto its system.

An historical review of the growth of Citizens' plant investments and revenues shows that the growth in plant investment has significantly out-paced the growth in revenues. Between 1992 and 1996, Citizens' utility plant investment grew by approximately 36%, while revenues grew by only 24% over the same period. Incrementally, the increase in plant investment per new customer over the '92-'96 period outpaced the increase in revenue per new customer by a factor exceeding 2.5-to-1. Since the growth in revenues and plant investment is driven primarily by new customer additions, Citizens concludes that new customers are adding cost to Citizens' electric system at a greater rate than they are providing increased revenue. Consequently, through the rate making process where costs are averaged across broad groups of customers, existing customers end up subsidizing the higher costs imposed by new customers.

While Citizens does not have specific proposals at this time, it recognizes that equitable remedies to this situation require adjustments to the policies and rates charged for new line extensions. Developing these remedies will require additional study that Citizens believe is appropriately conducted within the context of this unbundled rate filing. As the Arizona industry is restructured and Citizens' regulated operations become in essence a "poles and wires" business, it is entirely appropriate as part of this transition to ensure that the charges associated with the expansion of its distribution system are fair and equitable.

Citizens seeks an acknowledgment from the Commission that this issue is reasonably handled within this proceeding and, given such acknowledgment, intends to conduct the needed studies during the preliminary stages of this proceeding and to introduce specific proposals for altering its line extension policies and rates.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 1

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

CITIZENS UTILITIES COMPANY

Arizona Electric Division

Tariffs for Electric Service

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 2

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

TARIFFS FOR ELECTRIC SERVICE

Table of Contents

<u>Tariff</u>	<u>Page Number</u>
RESIDENTIAL SERVICE MOHAVE	Original Sheet No. 3
RESIDENTIAL SERVICE SANTA CRUZ	Original Sheet No. 5
C.A.R.E.S. SUPPLEMENT	Original Sheet No. 7
SMALL GENERAL SERVICE SANTA CRUZ	Original Sheet No. 9
SMALL GENERAL SERVICE MOHAVE	Original Sheet No. 11
LARGE GENERAL SERVICE	Original Sheet No. 14
LARGE POWER SERVICE	Original Sheet No. 17
INTERRUPTIBLE POWER SERVICE	Original Sheet No. 22
FLEXIBLE PRICING	Original Sheet No. 25
DUSK-TO-DAWN LIGHTING SERVICE	Original Sheet No. 26
RATES FOR POWER AND ENERGY TRANSACTIONS WITH QUALIFYING FACILITIES THAT RECEIVE FULL REQUIREMENTS 100 kW OR LESS	Original Sheet No. 29
RATES FOR POWER AND ENERGY TRANSACTIONS WITH QUALIFYING FACILITIES THAT RECEIVE PARTIAL REQUIREMENTS 100 kW OR LESS	Original Sheet No. 33
RATES FOR POWER AND ENERGY TRANSACTIONS WITH QUALIFYING FACILITIES THAT RECEIVE OPTIONAL SERVICE OVER 100 kW	Original Sheet No. 37

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 3

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RESIDENTIAL SERVICE MOHAVE (RSMO)

AVAILABILITY

In all territory served by the Company in Mohave County at all points where the adjacent facilities of the Company are adequate and suitable.

APPLICABILITY

Standard offer sales service to all residential customers for domestic service purposes. Service is provided at one point of delivery measured through one meter and is restricted to private single family dwellings or individually metered apartments. Residential Service is not applicable to hotels, rooming houses, public buildings, or any other premises not strictly residential.

CHARACTER OF SERVICE

Single phase, 60 hertz, at one standard voltage.

MONTHLY BILL

The monthly bill shall consist of the following charges and adjustments:

Customer Service Charge of \$11.01 per month.

Energy Charge:

All kWh \$0.0710 per kWh.

Adjustments:

The energy charge shall be subject to an adjustment per kWh to reflect any increase or decrease in the cost to the Company of energy either generated or purchased above or below the base cost of 5.194 cents per kWh sold.

The billing hereunder shall be increased by the applicable proportionate part of any taxes or governmental impositions which may be assessed on the basis of gross revenue of the Company and/or the price of, or revenue from, the electric energy sold, and/or the volume of electric energy generated or purchased for sale and/or sold hereunder.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 4

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RESIDENTIAL SERVICE MOHAVE (RSMO) (Continued)

TERMS AND CONDITIONS

Service under this schedule is for the exclusive use of the Customer and shall not be resold or shared with others.

This rate is subject to the general rules and regulations of the Company on file with the Arizona Corporation Commission, which are made a part hereof.

Standby, supplementary, breakdown, or temporary service shall not be rendered under this rate.

A delayed payment charge as stated in the general rules and regulations will be applied to account balances carried forward from prior billings.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 5

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RESIDENTIAL SERVICE SANTA CRUZ (RSSC)

AVAILABILITY

In all territory served by the Company in Santa Cruz County at all points where the adjacent facilities of the Company are adequate and suitable.

APPLICABILITY

Standard offer sales service to all residential customers for domestic service purposes. Service is provided at one point of delivery measured through one meter and is restricted to private single family dwellings or individually metered apartments. Residential Service is not applicable to hotels, rooming houses, public buildings, or any other premises not strictly residential.

CHARACTER OF SERVICE

Single phase, 60 hertz, at one standard voltage.

MONTHLY BILL

The monthly bill shall consist of the following charges and adjustments:

Customer Service Charge of \$11.01 per month.

Energy Charge:

All kWh metered \$0.0743 per kWh.

Adjustments:

The energy charge shall be subject to an adjustment per kWh to reflect any increase or decrease in the cost to the Company of energy either generated or purchased above or below the base cost of 5.194 cents per kWh sold.

The billing hereunder shall be increased by the applicable proportionate part of any taxes or governmental impositions which may be assessed on the basis of gross revenue of the Company and/or the price of, or revenue from, the electric energy sold, and/or the volume of electric energy generated or purchased for sale and/or sold hereunder.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 6

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RESIDENTIAL SERVICE SANTA CRUZ (RSSC) (Continued)

TERMS AND CONDITIONS

Service under this schedule is for the exclusive use of the Customer and shall not be resold or shared with others.

This rate is subject to the general rules and regulations of the Company on file with the Arizona Corporation Commission, which are made a part hereof.

Standby, supplementary, breakdown, or temporary service shall not be rendered under this rate.

A delayed payment charge as stated in the general rules and regulations will be applied to account balances carried forward from prior billings.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 7

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

CITIZENS ASSISTANCE RESIDENTIAL ENERGY SUPPORT (C.A.R.E.S.) A SUPPLEMENT TO THE RESIDENTIAL SERVICE (RS) TARIFFS

AVAILABILITY

This C.A.R.E.S. tariff is available in all territory served by the Company in Mohave and Santa Cruz Counties, Arizona, where facilities of adequate capacity and the required phase and voltage are adjacent to the premises served.

APPLICABILITY

This standard offer sales service C.A.R.E.S. tariff is available to those residential customers presently taking service under the Company's residential service rate whose gross annual income is not more than 150% of the federal poverty level guideline effective at the time qualification and annual certification is sought. Residential customers who desire to qualify for such tariff must initially make application to the Company for qualification and must obtain a verification by the Arizona Department of Economic Security that the customer's household gross income does not exceed 150% of the federal poverty level. For each year subsequent to the initial certification, the residential customer who seeks to retain eligibility for the C.A.R.E.S. must provide a personal certification that the household gross income of the residential dwelling unit involved does not exceed 150% of the federal poverty level. The Company may verify eligibility with the Arizona Department of Economic Security.

MONTHLY BILL

For all qualified C.A.R.E.S. residential customers, the monthly bill shall be computed in accordance with the Company's currently approved residential rate except:

For Bills with <u>Usage of:</u>	The Total Bill (Before Taxes & Regulatory Assessment) Will be <u>Discounted by:</u>
0 - 300 kWh	\$5.05
301 - 600 kWh	\$5.05
601 - 1000 kWh	\$5.05
1001 + kWh	\$5.05

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 8

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

CITIZENS ASSISTANCE RESIDENTIAL ENERGY SUPPORT (C.A.R.E.S.) A SUPPLEMENT TO THE RESIDENTIAL SERVICE (RS) TARIFFS

Low Income Medical Life Support Program

For all qualified C.A.R.E.S. residential customers, who are also medically life support dependent as prescribed by a physician, the monthly bill shall be computed in accordance with the Company's currently approved residential rate except:

For Bills with <u>Usage of:</u>	The Total Bill (Before Taxes & Regulatory Assessment) Will be <u>Discounted by:</u>
0 - 600 kWh	\$5.05
601 - 1200 kWh	\$5.05
1201 - 2000 kWh	\$5.05
2001 - kWh	\$5.05

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 9

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

SMALL GENERAL SERVICE SANTA CRUZ (SGSSC)

AVAILABILITY

In all territory served by the Company in Santa Cruz County at all points where the adjacent facilities of the Company are adequate and suitable.

APPLICABILITY

Standard offer sales service to any customer for any purpose where service is provided at one point of delivery and measured through one meter and where the monthly usage is not more than 5,000 kWh in any two consecutive months. Customers who use more than 5,000 kWh for two or more consecutive months shall not be eligible for this tariff and shall take service under the LGS tariff. However, service is available for customer-owned, operated, and maintained area, street, or stadium lighting, and for firm irrigation service with a maximum demand less than 25 kW.

CHARACTER OF SERVICE

Single phase, 60 hertz at one standard voltage. Three phase for eligible loads over 5 kW.

MONTHLY BILL

The monthly bill shall be the sum of the following charges and adjustments:

Customer Service Charge \$16.45 per month

Energy Charge All kWh \$0.1030 per kWh

Adjustments:

The energy charge shall be subject to an adjustment per kWh to reflect any increase or decrease in the cost to the Company of energy either generated or purchased above or below the base cost of 5.194 cents per kWh sold.

The billing hereunder shall be increased by the applicable proportionate part of any taxes on governmental impositions which may be assessed on the basis of gross revenue of the Company and/or the price of, or revenue from, the electric energy sold, and/or the volume of electric energy generated or purchased for sale and/or sold hereunder.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 10

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

SMALL GENERAL SERVICE SANTA CRUZ (SGSSC) (Continued)

TERMS AND CONDITIONS

Service under this schedule is for the exclusive use of the Customer and shall not be resold or shared with others.

This rate is subject to the general rules and regulations of the Company on file with the Arizona Corporation Commission, which are made a part hereof.

Customers who qualify for service under this tariff must remain on the tariff for a twelve-month period, unless, in the judgment of the Company, conditions require a different strategy or approach.

Standby, breakdown, or temporary service shall not be rendered under this rate.

A delayed payment charge as stated in the general rules and regulations will be applied to account balances carried forward from prior billings.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 11

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

SMALL GENERAL SERVICE MOHAVE (SGSMO)

AVAILABILITY

In all territory served by the Company in Mohave County at all points where the adjacent facilities of the Company are adequate and suitable.

APPLICABILITY

Standard offer sales service to any customer for any purpose where service is provided at one point of delivery and measured through one meter and where the monthly usage is not more than 5,000 kWh in any two consecutive months. Customers who use more than 5,000 kWh for two or more consecutive months shall not be eligible for this tariff and shall take service under the LGS tariff. However, service is available for customer-owned, operated, and maintained area, street, or stadium lighting, and for firm irrigation service with a maximum demand less than 25 kW.

CHARACTER OF SERVICE

Single phase, 60 hertz at one standard voltage. Three phase for eligible loads over 5 kW.

MONTHLY BILL

The monthly bill shall be the sum of the following charges and adjustments:

Customer Service Charge \$16.45 per month

Energy Charge All kWh \$0.0700 per kWh

Adjustments:

The energy charge shall be subject to an adjustment per kWh to reflect any increase or decrease in the cost to the Company of energy either generated or purchased above or below the base cost of 5.194 cents per kWh sold.

The billing hereunder shall be increased by the applicable proportionate part of any taxes on governmental impositions which may be assessed on the basis of gross revenue of the Company and/or the price of, or revenue from, the electric energy sold, and/or the volume of electric energy generated or

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 12

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

purchased for sale and/or sold hereunder.

SMALL GENERAL SERVICE MOHAVE (SGSMO) (Continued)

TERMS AND CONDITIONS

Service under this schedule is for the exclusive use of the Customer and shall not be resold or shared with others.

This rate is subject to the general rules and regulations of the Company on file with the Arizona Corporation Commission, which are made a part hereof.

Standby, breakdown, or temporary service shall not be rendered under this rate.

Customers who qualify for service under this tariff must remain on the tariff for a twelve-month period, unless, in the judgment of the Company, conditions require a different strategy or approach.

A delayed payment charge as stated in the general rules and regulations will be applied to account balances carried forward from prior billings.

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ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 13

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

COMMERCIAL TIME OF DAY SERVICE (CTOD)

AVAILABILITY

This tariff is eliminated, but time-of-day service is available in conjunction with the Large General Service (LGS) tariff.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 14

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

LARGE GENERAL SERVICE (LGS)

AVAILABILITY

In all territory served by the Company in Santa Cruz and Mohave Counties at all points where the adjacent facilities of the Company are adequate and suitable.

APPLICABILITY

Standard offer sales service to any customer for any purpose where such service is supplied at one point of delivery and measured through one meter and the maximum monthly demand is less than 1,000 kW.

CHARACTER OF SERVICE

Single or three phase, 60 hertz, at the Company's standard voltages that are available within the vicinity of the Customer's premises. Customers may choose time-of use service as well.

MONTHLY BILL

The monthly bill shall consist of the following charges and adjustments:

Customer Service Charge of \$9.47 per month, or, if the optional time of day service is elected, the Customer Service Charge is \$14.47 per month.

Demand Charge

Billing demand \$12.77 per kW

Energy Charge

All kWh \$0.04610 per kWh.

Adjustments:

The energy charge shall be subject to an adjustment per kWh to reflect any increase or decrease in the cost to the Company of energy either generated or purchased above or below the base cost of 5.194 cents per kWh sold.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 15

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

LARGE GENERAL SERVICE (LGS) (Continued)

Adjustments: (Continued)

The billing hereunder shall be increased by the applicable proportionate part of any taxes on governmental impositions which may be assessed on the basis of gross revenue of the Company and/or the price, or revenue from, the electric energy sold, and/or the volume of electric energy generated or purchased for sale and/or sold hereunder.

DETERMINATION OF BILLING DEMAND

Normal service

If the time-of-use option is not chosen, the monthly billing demand shall be the highest measured fifteen-minute integrated reading of the demand meter during the billing month.

Time-of-Use

If time-of-use service is chosen, the monthly billing demand shall be the higher of:

- (i) the highest measured fifteen-minute integrated reading of the demand meter during the on-peak hours of the billing period,
- (ii) One-half the highest measured fifteen-minute integrated reading of the demand meter during the off-peak hours, or
- (iii) the contract capacity or 5 kW

ON-PEAK HOURS

During the months of May through October, on-peak hours are those hours between 11:00 a.m. and 10:00 p.m. each day, Monday through Saturday. All other hours shall be considered off-peak hours.

During the months of November through April, on-peak hours are those hours between 7:00 a.m. and 7:00 p.m. each day, Monday through Friday. All other hours shall be considered off-peak hours.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 16

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

LARGE GENERAL SERVICE (LGS) (Continued)

TERMS AND CONDITIONS

This rate is subject to the general rules and regulations of the Company on file with the Arizona Corporation Commission, which are made a part hereof.

Standby or breakdown service shall not be rendered under this rate except for Qualifying Facilities or Independent Power Producers that have entered into a Service or Purchase Agreement with the Company.

Customers who qualify for service under this tariff must remain on the tariff for a twelve-month period, unless, in the judgement of the Company and Customer, conditions require a different strategy or approach.

A delayed payment charge as stated in the general rules and regulations will be applied to account balances carried forward from prior billings.

Service under this schedule is for the exclusive use of the Customer and shall not be resold or shared with others, unless authorized by the Company.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 17

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

LARGE POWER SERVICE (LPS)

AVAILABILITY

In all territory served by the Company in Santa Cruz and Mohave Counties at all points where the adjacent facilities of the Company are adequate and suitable.

APPLICABILITY

Standard offer sales service to any customer for any purpose where the service is supplied at one point of delivery and measured through one meter when the maximum monthly demand is 1,000 kilowatts or greater, but if 10,000 kW or more, a service agreement spelling out minimum conditions must be entered into.

CHARACTER OF SERVICE

Three phase, 60 hertz, at the Company's standard transmission or distribution voltages that are available within the vicinity of the Customer's premises.

MONTHLY BILL

The monthly bill shall consist of the following charges and adjustments:

For service at less than 69,000 volts (Distribution Service):

Customer Charge of \$325.42 per month.

Demand Charge \$23.01 per kW of billing demand

Energy Charge \$0.0237 per kWh

Minimum Charge

The minimum charge shall be the customer charge plus the demand charge.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 18

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

LARGE POWER SERVICE (LPS) (Continued)

For service at 69,000 volts or higher (Transmission Service):

Customer Charge of \$713.24 per month.

Demand Charge \$15.05 per kW of billing demand

Energy Charge \$0.0237 per kWh

Minimum Charge:

The minimum charge shall be the customer charge plus the demand charge.

Adjustments:

The energy charge shall be subject to an adjustment per kWh to reflect any increase or decrease in the cost to the Company of energy either generated or purchased above or below the base cost of 5.194 cents per kWh sold.

The billing hereunder shall be increased by the applicable proportionate part of any taxes on governmental impositions which may be assessed on the basis of gross revenue of the Company and/or the price of, or revenue from, the electric energy and/or volume of electric energy generated or purchased for sale and/or sold hereunder.

A credit of 3% will be applied to the demand charge if the customer receives Distribution Service at primary voltage.

The Customer agrees to maintain, as nearly as practicable, a unity power factor. In the event that the Customer's power factor for any billing month is less than 85%, an adjustment shall be applied to the bill as follows:

Power Factor adjustment =
 $(\text{Maximum Demand} / (.15 + \text{PF})) - \text{Maximum Demand}) \times \text{Demand Charge}$

Where Maximum Demand is the highest measured fifteen-minute demand in kilowatts during the billing period.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 19

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

LARGE POWER SERVICE (LPS) (Continued)

DETERMINATION OF BILLING DEMAND

The monthly billing demand shall be the higher of

- (i) the highest measured fifteen-minute integrated reading of the demand meter during the on-peak hours of the billing period,
- (ii) One-half the highest measured fifteen-minute integrated reading of the demand meter during the off-peak hours,
- (iii) the highest demand billed during the preceding 11 months, or
- (iv) the contract capacity or 1,000 kW

In the event a customer achieves permanent, verifiable demand reduction through involvement in Citizens' Demand-Side Management (DSM) programs, such reductions will be applicable to adjusted demands billed during the 11 month period prior to the installation of the DSM measures.

ON-PEAK HOURS

During the months of May through October, on-peak hours are those hours between 11:00 a.m. and 10:00 p.m. each day, Monday through Saturday. All other hours shall be considered off-peak hours.

During the months of November through April, on-peak hours are those hours between 7:00 a.m. and 7:00 p.m. each day, Monday through Friday. All other hours shall be considered off-peak hours.

OTHER PROVISIONS

Service hereunder shall remain in full force and in effect until terminated by the customer unless otherwise provided for in the Service Agreement. Termination of service requires twenty-four (24) months advance notice in writing to the Company.

Service hereunder may require the customer to enter into a Service Agreement with the Company for a term of two years or longer, with a minimum contract demand capacity at the Company's option in view of the anticipated demand of the Customer.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 20

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

LARGE POWER SERVICE (LPS) (Continued)

TERMS AND CONDITIONS

This rate is subject to the General Rules and Regulations of the Company on file with the Arizona Corporation Commission which are made a part hereof.

Standby, supplementary, breakdown, and/or temporary service is available under this rate. At the Company's option, customers may have to enter into a Service or Purchase Agreement with the Company for this service.

Customers who qualify for service under this tariff must remain on the tariff for a twelve-month period, unless, in the judgement of the Company and Customer, conditions require a different strategy or approach.

A delayed payment charge as stated in the general rules and regulations will be applied to account balances carried forward from prior billings.

Service under this schedule is for the exclusive use of the Customer and shall not be resold or shared with others, unless authorized by the Company.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 21

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

PROMOTIONAL LARGE POWER SERVICE

AVAILABILITY

This tariff is eliminated, but is replaced by the Flexible Pricing (FLX) tariff.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 22

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

INTERRUPTIBLE POWER SERVICE (IPS)

AVAILABILITY

In all territory served by the Company in Santa Cruz and Mohave Counties at all points where the adjacent facilities of the Company are adequate and suitable.

APPLICABILITY

Standard offer sales service to any customer with a minimum demand of 50 kW for any purpose where such service is supplied at one point of delivery and measured through one meter and is interruptible within 15 minutes of verbal notice by the Company. The Customer must be able to interrupt service for up to eight hours per day.

CHARACTER OF SERVICE

Three phase, 60 hertz, at the Company's standard voltages that are available within the vicinity of the Customer's premises.

MONTHLY BILL

The monthly bill shall consist of the following charges and adjustments:

Customer Service Charge of \$10.91 per month.

Demand Charge

Billing demand \$4.09 per kW

Energy Charge

All kWh \$0.0461 per kWh.

Penalty for failure to Interrupt:

In the event that the Customer fails to interrupt its load when requested to do so by the Company, the Customer shall pay an additional charge as follows:

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 23

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

INTERRUPTIBLE POWER SERVICE (IPS)

Penalty for failure to Interrupt (continued):

For load less than or equal to 200 kW, the penalty is \$20.00 per kW

For load greater than or 200 kW, the penalty is \$60.00 per kW

For a second failure to interrupt in any 12 month period, the Customer will revert to the otherwise applicable firm tariff for a period of at least 12 months.

Adjustments:

The energy charge shall be subject to an adjustment per kWh to reflect any increase or decrease in the cost to the Company of energy either generated or purchased above or below the base cost of 5.194 cents per kWh sold.

The billing hereunder shall be increased by the applicable proportionate part of any taxes on governmental impositions which may be assessed on the basis of gross revenue of the Company and/or the price, or revenue from, the electric energy sold, and/or the volume of electric energy generated or purchased for sale and/or sold hereunder.

DETERMINATION OF BILLING DEMAND

The monthly billing demand shall be the highest measured fifteen-minute integrated reading of the demand meter during the billing month. If demand is not metered, the billing demand shall be based on nameplate ratings of connected motors and equipment, or by a test as approved by the Company.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 24

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

INTERRUPTIBLE POWER SERVICE (IPS) (continued.)

TERMS AND CONDITIONS

This rate is subject to the General Rules and Regulations of the Company on file with the Arizona Corporation Commission which are made a part hereof.

A delayed payment charge as stated in the general rules and regulations will be applied to account balances carried forward from prior billings.

The Company reserves the right to curtail service to the customer at any time and for such period of time that, in the sole judgment of the Company, the operation of the system requires curtailment by the customer.

Customers who qualify for service under this tariff must remain on the tariff for a twelve-month period, unless, in the judgement of the Company and Customer, conditions require a different strategy or approach. Service hereunder may require the customer to enter into a Service Agreement with the Company for a term of one year or longer, with a minimum Contract Demand at the Company's option in view of the anticipated demand of the Customer.

The Company will endeavor to provide the customer with as much advance notice as possible of the required interruptions or curtailments. However, the customer shall interrupt or curtail service within 15 minutes, if so requested.

The Company reserves the right to have automatic equipment installed for immediate interruption of the customer's load. Should the Company's automatic equipment fail to interrupt the load, no penalty will be assessed.

The Company shall not be responsible for any loss or damage caused by or resulting from interruption or curtailment of service under this tariff.

Standby, temporary, or breakdown service shall not be rendered under this rate.

Service under this schedule is for the exclusive use of the Customer and shall not be resold or shared with others, unless authorized by the Company.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 25

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

FLEXIBLE CONTRACTING (FLX)

AVAILABILITY

In all territory served by the Company in Santa Cruz and Mohave Counties at all points where the adjacent facilities of the Company are adequate and suitable.

APPLICABILITY

Standard offer sales service to any customer for any purpose where such service is supplied at one point of delivery and measured through one meter and the monthly demand is at least 1,000 kW, and who otherwise would be eligible for the LPS tariff. Customers must demonstrate ability to have all or part of their service requirements provided from a competitive alternative.

CHARACTER OF SERVICE

Service will be provided under Commission-approved contract. Contracts will include the following provisions:

- a) Customers will be responsible for incremental distribution or transmission investment which is required for service.
- b) Pricing shall be commensurate with potential alternatives.
- c) Service under this tariff will be subject to the Purchased Power and Fuel Adjustment Clause unless, on a case-by-case basis, the Commission approves otherwise.
- d) Pricing will at least yield revenue exceeding the marginal cost of service to the customer. For contracts with terms extending beyond the date which Citizens will be required to add capacity, marginal cost means long-run marginal cost.
- e) Pricing shall not exceed the prices set forth in the LPS tariff.
- f) Service Contracts under this tariff must be reviewed and approved by the Commission.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 26

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

DUSK-TO-DAWN LIGHTING SERVICE (LTG)

AVAILABILITY

In all territory served by the Company in Santa Cruz and Mohave Counties at all points where the adjacent facilities of the Company are adequate and suitable.

APPLICABILITY

Standard offer sales service to any Customer, including public agencies, for the lighting of streets, alleys, thoroughfares, public parks, playgrounds, or other public or private property where such lighting is controlled by a photocell and a contract for service is entered into with the Company.

CHARACTER OF SERVICE

Service is supplied on Company-owned fixtures and poles which are maintained by the Company. The poles, fixtures, and lamps available are the standard items stocked by the Company, and service is rendered at standard available voltages.

MONTHLY BILL

The monthly bill shall be the sum of the following charges and adjustments for each light:

Service Charge:

	Overhead <u>Service</u>	Underground <u>Service</u>
Existing Wood Pole	\$0.00	\$ 2.27
New 30' Wood Pole (Class 6)	4.55	6.82
New 30' Metal or Fiberglass	9.09	11.37

Lighting Charge:

Based on the rated wattage value of each lamp installed, \$0.05994 per watt per month.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 27

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

DUSK-TO-DAWN LIGHTING SERVICE (LTG)

Adjustments:

The energy charge shall be subject to an adjustment per kWh to reflect any increase or decrease in the cost to the Company of energy either generated or purchased above or below the base cost of 5.194 cents per kWh sold.

The billing hereunder shall be increased by the applicable proportionate part of any taxes or governmental impositions which may be assessed on the basis of gross revenue of the Company and/or the price of, or revenue from, the electric energy sold, and/or the volume of electric energy generated or purchased for sale and/or sold hereunder.

CONTRACT PERIOD

All dusk-to-dawn lighting installations for public agencies will require an agreement for service.

All dusk-to-dawn lighting installations for other than public agencies will require a contract for service as follows:

Five years initial term for installations on existing facilities, and

Five years initial term, or longer at the Company's option, for installations requiring new and/or an extension of facilities.

TERMS AND CONDITIONS

Overhead extensions beyond 150 feet, and underground extensions beyond 100 feet will require specific agreements providing adequate revenue or arrangements for construction financing.

The Customer is not authorized to make connections to the lighting circuit or make attachments or alterations to the Company-owned pole.

Should a Customer request a relocation of a dusk-to-dawn lighting installation, the costs of such relocation must be borne by the customer.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 28

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

DUSK-TO-DAWN LIGHTING SERVICE (LTG) (continued)

TERMS AND CONDITIONS (continued)

The Customer is expected to notify the Company when lamp outages occur.

The Company will use diligence in maintaining service; however, monthly bills will not be reduced because of lamp outages.

The Company may require a refundable advance for the installation of new construction for facilities.

Service is rendered under this schedule subject to the Company's Rules and Regulations on file with and approved by the Arizona Corporation Commission.

A delayed payment charge as stated in the general rules and regulations will be applied to account balances carried forward from prior billings.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 29

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RATES FOR POWER AND ENERGY TRANSACTIONS WITH QUALIFYING FACILITIES THAT RECEIVE FULL REQUIREMENTS 100 kW OR LESS (QF-A)

AVAILABILITY

Throughout the Company's service area in Santa Cruz and Mohave Counties at all points where the adjacent facilities are adequate and suitable, for all Qualifying Facilities (QF's) that have entered into a Service Agreement with the Company. Limited to those customers taking service on this tariff prior to January 1, 1999.

APPLICABILITY

Standard offer sales service to all QF's with 100 kW or less operating in the Buy/Sell Mode for full requirements, supplementary power, stand-by power, and maintenance power service.

CHARACTER OF SERVICE

Electric sales to the Company must be single or three phase, 60 Hertz, at a standard voltage subject to availability at the premises. The QF will have the option to sell energy to the Company at a voltage level different from that for purchases from the Company, however, the QF will be responsible for all costs incurred to accommodate such an arrangement.

DEFINITIONS

1. Qualifying Facilities - Cogeneration and small power production facilities where the facility's generator(s) and load are located at the same premise and that otherwise meet qualifying criteria for size, fuel use, efficiency and ownership as promulgated in 18 C.F.R., Chapter I, Part 292, Subpart B of FERC Regulations.
2. Buy/Sell Mode of Operation - The QF's total generation output is delivered to the Company and the QF's full requirements for service are provided by the Company or no electric requirements are required by the QF.
3. Full Requirements Service - Any instance whereby the Company provides all the electric requirements of a QF.
4. Energy - Electric energy which is supplied by the QF.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 30

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RATES FOR POWER AND ENERGY TRANSACTIONS WITH QUALIFYING FACILITIES THAT RECEIVE FULL REQUIREMENTS 100 kW OR LESS (QF-A) (Continued)

5. Firm Capacity - Capacity available, upon demand, at all times (except for forced outages and scheduled maintenance) during the period covered by the Agreement from the QF with an availability factor of at least 80%, as defined by the North American Electric Reliability Council.
6. Net Energy - The total kilowatt hours (kWh) sold to the QF by the company less the total kWh's purchased by the Company from the QF.
7. Supplementary Power - Electric capacity and energy supplied by the Company regularly used by the QF in addition to that which the facility generates itself.
8. Stand-by Power - Electric capacity and energy supplied by the Company to replace energy ordinarily generated by a facility's own generation equipment during an unscheduled outage of the facility.
9. Maintenance Power - Electric capacity and energy supplied by the Company during scheduled outages of the QF.
10. Purchase Agreement - Agreements for the purchase of electric energy and capacity from and the sale of power to the QF entered into between the Company and QF.

BILLING FOR BUY/SELL

The customer will have the option of choosing either of the following two methods for determining the bill for purchases and sales.

Combined Bill method:

The kWh's sold to the Company shall be subtracted from the kWh's purchased from the Company. If the calculation is positive, the Net Energy kWh's received from the Company will be priced at the applicable Electric Rate Schedule under which the QF would otherwise purchase its full, requirements service. If the calculation is negative, the Net Energy kWh's delivered to the Company will be priced at the purchase rate shown below.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 31

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RATES FOR POWER AND ENERGY TRANSACTIONS WITH QUALIFYING FACILITIES THAT RECEIVE FULL REQUIREMENTS 100 kW OR LESS (QF-A) (Continued)

Separate Bill Method:

All purchases and sales shall be treated separately with the sales to the QF billed at the applicable Electric Rate Schedule under which the QF would otherwise purchase its full requirements service, and purchases of energy for the QF at the purchase rate shown below.

RATES FOR SALES TO QF'S

The rates and billings for sales of energy and capacity to the QF shall be priced at the rates in the otherwise applicable tariff for the Customer.

RATES FOR PURCHASES FROM QF'S

A Service Charge of \$10.00 per month will be assessed each QF selling energy to the Company under this rate schedule.

Rates for Energy purchased from the QF shall be priced at short run avoided cost.

Rates for Firm Capacity purchased from the QF shall be priced at long-run avoided cost based upon deferral of capacity additions indicated in Company's resource plan.

Adjustments:

The charges stated herein may be subject to an adjustment per kWh to reflect and increase or decrease in the cost to the Company of the energy either generated or purchased above or below the base cost of \$0.05194.

The billing hereunder shall be increased by the applicable proportionate part of any taxes on governmental impositions which may be assessed on the basis of gross revenue of the Company and/or the price of, or revenue from, the electric energy and/or volume of electric energy generated or purchased for sale and/or sold hereunder.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 32

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RATES FOR POWER AND ENERGY TRANSACTIONS WITH
QUALIFYING FACILITIES THAT RECEIVE
FULL REQUIREMENTS 100 kW OR LESS (QF-A) (Continued)

METER CONFIGURATION

Insert Drawing Here

CONTRACT PERIOD

As provided for in the Service Agreement.

TERMS AND CONDITIONS

Subject to:

The Service Agreement, and

This rate is subject to the general Rules and Regulations of the Company on file with the Arizona Corporation Commission, which are made a part hereof.

A delayed payment charges as stated in the general rules and regulations will be applied to account balances carried forward from prior billings.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 33

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RATES FOR POWER AND ENERGY TRANSACTIONS WITH QUALIFYING FACILITIES THAT RECEIVE PARTIAL REQUIREMENTS 100 kW OR LESS (QF-B)

AVAILABILITY

Throughout the Company's service area in Santa Cruz and Mohave Counties at all points where the adjacent facilities are adequate and suitable, for all Qualifying Facilities (QF's) that have entered into a Service Agreement with the Company. Limited to those customers taking service on this tariff prior to January 1, 1999.

APPLICABILITY

Standard offer sales service to all QF's with 100 kW or less operating in the Partial Requirements Mode for partial requirements, supplementary power, stand-by power, and maintenance power service.

CHARACTER OF SERVICE

Electric sales to the Company must be single or three phase, 60 Hertz, at a standard voltage subject to availability at the premises. The QF will have the option to sell energy to the Company at a voltage level different from that for purchases from the Company, however, the QF will be responsible for all costs incurred to accommodate such an arrangement.

DEFINITIONS

1. Qualifying Facilities - Cogeneration and small power production facilities where the facility's generator(s) and load are located at the same premise and that otherwise meet qualifying criteria for size, fuel use, efficiency and ownership as promulgated in 18 C.F.R., Chapter I, Part 292, Subpart B of FERC Regulations.
2. Partial Requirements Mode of Operation - A QF's generation output first goes to supply its own electric requirements with any excess energy (over and above its own requirements) then being sold to the Company. The Company supplies the QF's electric requirements not met by the QF's own-generation facilities. This also may be referred to as the "parallel mode" of operation.
3. Energy - Electric energy which is supplied by the QF

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 34

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RATES FOR POWER AND ENERGY TRANSACTIONS WITH QUALIFYING FACILITIES THAT RECEIVE PARTIAL REQUIREMENTS 100 kW OR LESS (QF-B) (Continued)

4. Firm Capacity - Capacity available, upon demand, at all times (except for forced outages and scheduled maintenance) during the period covered by the Agreement from the QF with an availability factor of at least 80%, as defined by the North American Electric Reliability Council.
5. Supplementary Power - Electric capacity and energy supplied by the Company regularly used by the QF in addition to that which the facility generates itself.
6. Stand-by Power - Electric capacity and energy supplied by the Company to replace energy ordinarily generated by a facility's own generation equipment during an unscheduled outage of the facility.
7. Maintenance Power - Electric capacity and energy supplied by the Company during scheduled outages of the QF.
8. Purchase Agreement - Agreements for the purchase of electric energy and capacity from and the sale of power to the QF entered into between the Company and QF.

RATES FOR SALES TO QF'S

The rates and billings for sales of energy and capacity to the QF shall be priced at the rates in the otherwise applicable tariff for the Customer.

RATES FOR PURCHASES FROM QF'S

A Service Charge of \$10.00 per month will be assessed each QF selling energy to the Company under this rate schedule.

Rates for Energy purchased from the QF shall be priced at short run avoided cost.

Rates for Firm Capacity purchased from the QF shall be priced at long-run avoided cost based upon deferral of capacity additions indicated in Company's resource plan.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 35

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RATES FOR POWER AND ENERGY TRANSACTIONS WITH QUALIFYING FACILITIES THAT RECEIVE PARTIAL REQUIREMENTS 100 kW OR LESS (QF-B) (Continued)

Adjustments:

The charges stated herein may be subject to an adjustment per kWh to reflect any increase or decrease in the cost to the Company of the energy either generated or purchased above or below the base cost of \$0.05194.

The billing hereunder shall be increased by the applicable proportionate part of any taxes on governmental impositions which may be assessed on the basis of gross revenue of the Company and/or the price of, or revenue from, the electric energy and/or volume of electric energy generated or purchased for sale and/or sold hereunder.

METER CONFIGURATION

Insert Drawing Here

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 36

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RATES FOR POWER AND ENERGY TRANSACTIONS WITH
QUALIFYING FACILITIES THAT RECEIVE
PARTIAL REQUIREMENTS 100 kW OR LESS (QF-B) (Continued)

CONTRACT PERIOD

As provided for in the Service Agreement.

TERMS AND CONDITIONS

Subject to:

The Service Agreement, and

This rate is subject to the general Rules and Regulations of the Company on file with the Arizona Corporation Commission, which are made a part hereof.

A delayed payment charges as stated in the general rules and regulations will be applied to account balances carried forward from prior billings.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 37

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RATES FOR POWER AND ENERGY TRANSACTIONS WITH QUALIFYING FACILITIES THAT RECEIVE OPTIONAL SERVICE OVER 100 kW (QF-C)

AVAILABILITY

Throughout the Company's service area in Santa Cruz and Mohave Counties at all points where the adjacent facilities are adequate and suitable, for all Qualifying Facilities (QF's) that have entered into a Service Agreement with the Company. Limited to those customers taking service on this tariff prior to January 1, 1999.

APPLICABILITY

Standard offer sales service to QF's operating in the Buy/Sell Mode for full requirements, or Partial Requirements Mode for partial requirements, supplementary power, stand-by power, and maintenance power service.

CHARACTER OF SERVICE

Electric sales to the Company must be single or three phase, 60 Hertz, at a standard voltage subject to availability at the premises. The QF will have the option to sell energy to the Company at a voltage level different from that for purchases from the Company, however, the QF will be responsible for all costs incurred to accommodate such an arrangement.

DEFINITIONS

1. Qualifying Facilities - Cogeneration and small power production facilities where the facility's generator(s) and load are located at the same premise and that otherwise meet qualifying criteria for size, fuel use, efficiency and ownership as promulgated in 18 C.F.R., Chapter I, Part 292, Subpart B of FERC Regulations.
2. Buy/Sell Mode of Operation - The QF's total generation output is delivered to the Company and the QF's full requirements for service are provided by the Company or no electric requirements are required by the QF.
3. Partial Requirements Mode of Operation - A QF's generation output first goes to supply its own electric requirements with any excess energy (over and above its own requirements) then being sold to the Company. The company supplies the QF's electric requirements not met by the QF's own-generating facilities. This also may be referred to as the "parallel mode" of operation.

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4. Full Requirements Service - Any instance whereby the Company provides all the electric requirements of a QF.
5. Energy - Electric energy which is supplied by the QF.
6. Firm Capacity - Capacity available, upon demand, at all times (except for forced outages and scheduled maintenance) during the period covered by the Agreement from the QF with an availability factor of at least 80%, as defined by the North American Electric Reliability Council.
7. Net Energy - The total kilowatt hours (kWh) sold to the QF by the company less the total kWh's purchased by the Company from the QF.
8. Supplementary Power - Electric capacity and energy supplied by the Company regularly used by the QF in addition to that which the facility generates itself.
9. Stand-by Power - Electric capacity and energy supplied by the Company to replace energy ordinarily generated by a facility's own generation equipment during an unscheduled outage of the facility.
10. Maintenance Power - Electric capacity and energy supplied by the Company during scheduled outages of the QF.
11. Purchase Agreement - Agreements for the purchase of electric energy and capacity from and the sale of power to the QF entered into between the Company and QF.

BILLING FOR BUY/SELL

The customer will have the option of choosing either of the following two methods for determining the bill for purchases and sales.

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Combined Bill method:

The kWh's sold to the Company shall be subtracted from the kWh's purchased from the Company. If the calculation is positive, the Net Energy kWh's received from the Company will be priced at the applicable Electric Rate Schedule under which the QF would otherwise purchase its full, requirements service. If the calculation is negative, the Net Energy kWh's delivered to the Company will be priced at the purchase rate shown below.

Separate Bill Method:

All purchases and sales shall be treated separately with the sales to the QF billed at the applicable Electric Rate Schedule under which the QF would otherwise purchase its full requirements service, and purchases of energy for the QF at the purchase rate shown below.

RATES FOR SALES TO QF'S

Supplementary Service:

- A. Service Charge - The service charge shall be the basic service charge using the otherwise applicable retail rate.
- B. Energy Charge - The energy charge shall be the energy charge using the otherwise applicable retail rate.
- C. Demand Charge - The demand charge shall be the demand charge using the otherwise applicable retail rate and it shall apply only to supplemental power and not to total requirements.

Standby Service:

- A. Service Charge - The service charge shall be the basic service charge using the otherwise applicable retail rate.
- B. Energy Charge - The energy charge is \$0.045 per kWh per month.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 40

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RATES FOR POWER AND ENERGY TRANSACTIONS WITH QUALIFYING FACILITIES THAT RECEIVE OPTIONAL SERVICE OVER 100 kW (QF-C) (Continued)

- C. Demand Charge - The demand charge shall be the product of \$27.83 per kW per month and the probability (*) that the QF has an unscheduled outage at the time of the company's peak.

(*) This value is initially set at .10 (10%) for the first year and reset annually based upon actual experience with the QF.

Maintenance Service:

- A. Service Charge - The service charge shall be the basic service charge using the otherwise applicable retail rate.
- B. Energy Charge - The energy charge is \$0.045 per kWh per month.
- C. Maintenance Service - Must be scheduled with the Company and may only be scheduled during the period October through April

Only one service charge will be applied for each billing period.

RATES FOR PURCHASES FROM QF'S

A service Charge of \$10.00 per month will be assessed each QF selling energy to the Company under this rate schedule. A service charge for purchases from the QF will only be charged if a service charge was not assessed for sales to the QF.

Rates for Energy purchased from the QF shall be priced at short run avoided cost.

Rates for Firm Capacity purchased from the QF shall be priced at long-run avoided cost based upon deferral of capacity additions indicated in Company's resource plan.

Rates for capacity associated with Firm Capacity shall be as provided for in the Service Agreement.

Date Effective: January 1, 1999

Authority: ACC Decision No.

ELECTRIC RATES

CITIZENS UTILITIES COMPANY

Original Sheet No. 41

Filed by: Paul G. Townsley

Mohave and Santa Cruz Counties, Arizona

RATES FOR POWER AND ENERGY TRANSACTIONS WITH QUALIFYING FACILITIES THAT RECEIVE OPTIONAL SERVICE OVER 100 kW (QF-C) (Continued)

Adjustments:

The charges stated herein may be subject to an adjustment per kWh to reflect any increase or decrease in the cost to the Company of the energy either generated or purchased above or below the base cost of \$0.05194.

The billing hereunder shall be increased by the applicable proportionate part of any taxes on governmental impositions which may be assessed on the basis of gross revenue of the Company and/or the price of, or revenue from, the electric energy and/or volume of electric energy generated or purchased for sale and/or sold hereunder.

METER CONFIGURATION

As provided for in a Service Agreement.

CONTRACT PERIOD

As provided for in the Service Agreement.

TERMS AND CONDITIONS

Subject to:

The Service Agreement, and

This rate is subject to the general Rules and Regulations of the Company on file with the Arizona Corporation Commission, which are made a part hereof.

A delayed payment charges as stated in the general rules and regulations will be applied to account balances carried forward from prior billings.

Date Effective: January 1, 1999

Authority: ACC Decision No.

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 1

SUMMARY

	ALOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
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SUMMARY OF RESULTS - 1

DEVELOPMENT OF RETURN AT PREVIOUS RATES PER ACC ORDER

1	RATE BASE							
2	ELECTRIC PLANT IN SERVICE	174,431,751	74,803,002	8,446,921	76,939,466	11,181,726	1,280,837	1,779,799
3	DEPRECIATION RESERVE	56,392,596	23,761,934	2,676,957	25,532,974	3,660,777	404,598	355,366
4	DEFERRED TAXES & TAX CREDITS	4,944,879	2,110,204	239,685	2,193,502	313,834	35,438	52,216
5	WORKING CAPITAL	(22,725,266)	(9,585,500)	(1,138,093)	(10,073,930)	(1,499,613)	(164,639)	(263,491)
6								
7	RATE BASE	90,369,010	39,345,364	4,392,186	39,139,060	5,707,502	676,161	1,108,736
8								
9								
10	DEVELOPMENT OF RETURN							
11	SALES OF ELECTRICITY BY RATE CLASS	81,464,701	37,399,701	4,805,544	28,992,777	8,917,502	1,134,714	214,463
12	PPFAC	(1,471,459)	(677,702)	(70,381)	(521,390)	(171,739)	(27,342)	(2,904)
13	OTHER OPERATING REVENUES	728,014	334,225	42,945	259,096	79,692	10,140	1,917
14	TOTAL OPERATING REVENUES	80,721,256	37,056,223	4,778,108	28,730,482	8,825,455	1,117,512	213,475
15								
16	LESS:							
17	OPER & MAINT EXPENSE	59,363,976	28,718,670	2,953,049	21,484,748	5,241,325	794,076	172,107
18	DEPRECIATION EXPENSE	6,684,267	2,828,594	321,617	2,993,832	424,406	46,606	69,212
19	TAXES OTHER THAN INCOME	3,890,971	1,680,333	190,599	1,705,292	246,752	28,263	39,732
20	STATE & FEDERAL INCOME TAX	3,010,147	976,301	458,589	453,737	1,071,944	89,119	(39,543)
21	TOTAL OPERATING EXPENSE	72,949,361	34,203,898	3,923,855	26,637,609	6,984,427	958,064	241,507
22								
23	NET OPERATING INCOME	7,771,895	2,852,325	854,254	2,092,873	1,841,028	159,448	(28,032)
24								
25	RATE OF RETURN	8.60%	7.25%	19.45%	5.35%	32.26%	23.58%	-2.53%
26	RELATIVE RATE OF RETURN	1.00	0.84	2.26	0.62	3.75	2.74	-0.29

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

	ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
SUMMARY OF RESULTS - 2								
DEVELOPMENT OF RETURN AT EQUALIZED CURRENT RATE LEVELS								
1 RATE BASE		90,369,010	39,345,364	4,392,186	39,139,060	5,707,502	676,161	1,108,736
2 RETURN		8,944,117	3,894,139	434,709	3,873,721	564,890	66,922	109,735
3 RATE OF RETURN		9.90	9.90	9.90	9.90	9.90	9.90	9.90
4 OPER & MAINT EXPENSE		59,363,976	28,718,670	2,953,049	21,484,748	5,241,325	794,076	172,107
5 DEPRECIATION EXPENSE		6,684,267	2,828,594	321,617	2,993,832	424,406	46,606	69,212
6 TAXES OTHER THAN INCOME		3,890,971	1,680,333	190,599	1,705,292	246,752	28,263	39,732
7 TAX EXPENSE		3,783,813	1,663,898	181,690	1,629,097	229,694	28,052	51,383
8 TOTAL OPERATING EXPENSE		73,723,027	34,891,496	3,646,955	27,812,969	6,142,176	896,997	332,434
9 TOTAL COST OF SERVICE		82,667,144	38,785,635	4,081,664	31,686,690	6,707,067	963,919	442,169
10 LESS:								
11 PPFAC	EPROD	0	0	0	0	0	0	0
12 OTHER OPERATING REVENUES		728,014	334,225	42,945	259,096	79,692	10,140	1,917
13 EQUALS:								
14 PROPOSED BASE RATE SALES OF ELECTRICITY		81,939,130	38,451,411	4,038,719	31,427,594	6,627,375	953,779	440,252

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

	ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
DEVELOPMENT OF RATE BASE - 3								
ELECTRIC PLANT IN SERVICE								
1 INTANGIBLE PLANT	PISXGENL	561,786	240,915	27,205	247,786	36,013	4,125	5,732
2 TANGIBLE PLANT								
3 PRODUCTION								
4 STEAM	DTRAN	11,600	5,670	546	4,284	955	144	0
5 NUCLEAR	DTRAN	0	0	0	0	0	0	0
6 OTHER	DTRAN	11,805,174	5,770,294	556,137	4,360,191	972,270	146,282	0
7 HYDRO	DTRAN	0	0	0	0	0	0	0
8 TOTAL PRODUCTION PLANT		11,816,774	5,775,964	556,683	4,364,475	973,225	146,426	0
9 TRANSMISSION								
10 350 - LAND	DTRANSUB	474,608	231,985	22,359	175,294	39,089	5,881	0
11 352 - STRUCTURES & IMPROV.	DTRANSUB	192,161	93,927	9,053	70,974	15,826	2,381	0
12 353 - STATION EQUIPMENT	DTRANSUB	8,066,080	3,942,649	379,989	2,979,172	664,320	99,950	0
13 354 - TOWERS & FIXTURES	DTRANSUB	85,731	41,905	4,039	31,664	7,061	1,062	0
14 355 - POLES & FIXTURES	DTRANSUB	5,366,646	2,623,183	252,820	1,982,148	441,995	66,500	0
15 356 - OVHD CONDUCTOR & DEVIC	DTRANSUB	7,576,611	3,703,400	356,931	2,798,389	624,007	93,885	0
16 357 - UNDERGROUND CONDUIT	DTRANSUB	0	0	0	0	0	0	0
17 358 - UDGCR CONDUCTOR & DEVIC	DTRANSUB	12,667	6,192	597	4,679	1,043	157	0
18 359 - ROADS & TRAILS	DTRANSUB	229,630	112,242	10,818	84,813	18,912	2,845	0
19 TOTAL TRANSMISSION PLANT		22,004,134	10,755,482	1,036,605	8,127,133	1,812,253	272,661	0

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 4

SUMMARY

DEVELOPMENT OF RATE BASE (CONT) - 4		ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
1	DISTRIBUTION								
2	360 - LAND & LAND RIGHTS	DDISPSUB	328,395	123,331	14,019	166,366	21,547	2,679	453
3	361 - STRUCTURES & IMPROV.	DDISPSUB	468,769	176,050	20,012	237,480	30,757	3,825	646
4	362 - STATION EQUIPMENT	DDISPSUB	11,769,020	4,427,450	503,267	5,972,356	773,515	96,165	16,246
5	364 - POLES, TOWERS & FIXTURES								
6	PRIMARY	DDISTPOL	36,856,057	13,841,554	1,573,367	18,671,399	2,418,244	300,704	50,790
7	SECONDARY	DDISTPOL	0	0	0	0	0	0	0
8	TOTAL ACCOUNT 364		36,856,057	13,841,554	1,573,367	18,671,399	2,418,244	300,704	50,790
9	365 - OVHD CONDUCTOR & DEVICES								
10	PRIMARY	DDISTPOL	25,747,015	9,669,474	1,099,127	13,043,522	1,689,344	210,067	35,481
11	SECONDARY	DDISTPOL	0	0	0	0	0	0	0
12	TOTAL ACCOUNT 365		25,747,015	9,669,474	1,099,127	13,043,522	1,689,344	210,067	35,481
13	366 - UJGR CONDUCTOR & DEVICES								
14	PRIMARY	DDISTPOL	3,792,952	1,424,470	161,919	1,921,522	248,868	30,946	5,227
15	SECONDARY	DDISTPOL	0	0	0	0	0	0	0
16	TOTAL ACCOUNT 366		3,792,952	1,424,470	161,919	1,921,522	248,868	30,946	5,227
17	367 - UJGR CONDUIT								
18	PRIMARY	DDISTPOL	9,701,848	3,643,598	414,167	4,914,988	636,569	79,156	13,370
19	SECONDARY	DDISTPOL	0	0	0	0	0	0	0
20	TOTAL ACCOUNT 367		9,701,848	3,643,598	414,167	4,914,988	636,569	79,156	13,370
21	368 - LINE TRANSFORMER								
22	OVERHEAD	DDISTPOL	22,581,271	8,550,317	971,913	11,533,849	1,493,817	0	31,374
23	UNDERGROUND	DDISTPOL	0	0	0	0	0	0	0
24	TOTAL ACCOUNT 368		22,581,271	8,550,317	971,913	11,533,849	1,493,817	0	31,374
25	369 - SERVICE DROP								
26	OVERHEAD	DDISTPOL	6,907,352	5,533,561	780,815	575,492	2,778	12,590	2,117
27	UNDERGROUND	DDISTPOL	0	0	0	0	0	0	0
28	TOTAL ACCOUNT 369		6,907,352	5,533,561	780,815	575,492	2,778	12,590	2,117
29	370 - METERS	DDISTPOL	5,140,518	4,090,368	548,129	425,531	65,616	9,309	1,565
30	371 - INST. ON CUST. PREMISE	DDISTPOL	0	0	0	0	0	0	0
31	373 - STREET LIGHTS	DDISTPOL	1,460,943	0	0	0	0	0	1,460,943
32									
33	TOTAL DISTRIBUTION PLANT		124,774,140	51,480,172	6,086,734	57,462,505	7,381,056	745,462	1,618,211
34	GENERAL PLANT								
35	CIAC, ACQUISITION ADJUSTMENT	PISXGENL	13,129,201	5,630,303	635,786	5,791,111	841,631	96,407	133,963
36	COMMON	PISXGENL	2,145,716	920,165	103,907	946,446	137,548	15,756	21,894
37									
38									
39	TOTAL ELECTRIC PLANT IN SERVICE		174,431,751	74,803,002	8,446,921	76,939,466	11,181,726	1,280,837	1,779,799

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 5

SUMMARY

	ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
DEVELOPMENT OF RATE BASE (CONT) - 5								
1 DEPRECIATION RESERVE								
2 PRODUCTION	PRODPIS	3,247,217	1,587,219	152,975	1,199,346	267,440	40,237	0
3 TRANSMISSION	TRANPIS	6,688,321	3,269,209	315,084	2,470,303	550,848	82,877	0
4 DISTRIBUTION		0	0	0	0	0	0	0
5 360 - LAND & LAND RIGHTS	PLT360	129,254	48,542	5,518	65,480	8,481	1,055	178
6 361 - STRUCTURES & IMPROV.	PLT361	3,630,955	1,363,631	155,004	1,839,454	238,239	29,625	5,004
7 362 - STATION EQUIPMENT	PLT362	13,794,151	5,180,491	588,865	6,988,162	905,078	112,545	19,009
8 364 - POLES, TOWERS & FIXTURES	PLT364	9,557,736	3,589,476	408,015	4,841,980	627,114	77,980	13,171
9 365 - OVHD CONDUCTOR & DEVICE	PLT365	598,383	224,727	25,545	303,143	39,262	4,882	825
10 366 - UDGR CONDUCTOR & DEVICE	PLT366	2,463,629	925,233	105,171	1,248,083	161,647	20,100	3,395
11 367 - UDGR CONDUIT	PLT367	8,884,085	3,363,927	382,377	4,537,729	587,708	0	12,343
12 368 - LINE TRANSFORMER	PLT368	1,904,155	1,525,441	215,248	158,646	766	3,471	584
13 369 - SERVICE DROP	PLT369	1,196,297	951,907	127,560	99,029	15,270	2,166	364
14 370 - METERS	PLT370	(22)	(18)	(2)	(2)	(0)	(0)	(0)
15 371 - INSTAL. ON CUST. PREMISE	PLT371	259,270	0	0	0	0	0	259,270
16 373 - STREET LIGHTS	PLT373	42,417,883	17,173,357	2,013,300	20,081,705	2,583,564	251,824	314,143
17 TOTAL DISTRIBUTION DEPR RESV.		4,039,165	1,732,148	195,598	1,781,621	258,926	29,659	41,213
18 GENERAL	PISXGENL	56,392,596	23,761,934	2,676,957	25,532,974	3,660,777	404,598	355,356
19 TOTAL DEPRECIATION RESERVE		118,039,155	51,041,068	5,769,964	51,406,492	7,520,949	876,239	1,424,443
20 NET PLANT IN SERVICE								
21								
22								
23								
24								
25 DEFERRED TAXES AND TAX CREDITS								
26 PRODUCTION	PRODPIS	269,776	131,865	12,709	99,641	22,219	3,343	0
27 TRANSMISSION	TRANPIS	502,352	245,546	23,666	185,542	41,374	6,225	0
28 DISTRIBUTION	DISTPIS	3,485,390	1,438,026	170,024	1,605,134	206,179	20,823	45,202
29 GENERAL	PISXGENL	687,361	294,767	33,286	303,186	44,062	5,047	7,013
30 TOTAL DEF. TAXES AND TAX CREDITS		4,944,879	2,110,204	239,685	2,193,502	313,834	35,438	52,216
31								
32 WORKING CAPITAL								
33 DSM BALANCE	EDSM	0	0	0	0	0	0	0
34 MATERIALS & SUPPLIES	OM	1,635,277	837,785	101,461	576,159	86,049	10,650	23,154
35 CASH WORKING CAPITAL (LEAD LAG)								
36 FUEL RELATED	EPFROD	(930,743)	(428,668)	(44,518)	(329,795)	(108,630)	(17,295)	(1,837)
37 OTHER	OM	(2,303,424)	(1,180,090)	(142,945)	(811,568)	(121,207)	(15,001)	(32,614)
38 TOTAL CASH WORKING CAPITAL		(3,234,167)	(1,608,757)	(187,463)	(1,141,363)	(229,837)	(32,296)	(34,451)
39 CIAC & AMORT	DISTPIS	(3,969,757)	(1,637,870)	(193,653)	(1,828,201)	(234,832)	(23,717)	(51,484)
40 CUSTOMER ADVANCES	DISTPIS	(15,047,932)	(6,208,579)	(734,069)	(6,930,057)	(890,165)	(89,904)	(195,158)
41 CUSTOMER DEPOSITS	SALESREV	(2,108,687)	(966,079)	(124,390)	(750,468)	(230,827)	(29,372)	(5,551)
42 TOTAL WORKING CAPITAL		(22,725,266)	(9,585,500)	(1,138,093)	(10,073,930)	(1,489,613)	(164,639)	(263,491)
43								
44 TOTAL RATE BASE		90,369,010	39,345,364	4,392,166	39,139,060	5,707,502	676,161	1,108,736

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

ALLOC		TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
OPERATING REVENUES - 6								
ELECTRIC OPERATING REVENUES								
1	SALES OF ELECTRICITY	81,464,701	37,399,701	4,805,544	28,992,777	8,917,502	1,134,714	214,463
2	BASE RATE SALES BY RATE CLASS	(1,471,459)	(677,702)	(70,361)	(521,390)	(171,739)	(27,342)	(2,904)
3	PPFA	79,993,242	36,721,999	4,735,163	28,471,387	8,745,763	1,107,372	211,559
4	TOTAL SALES OF ELECTRICITY							
5	OTHER OPERATING REVENUE	0	0	0	0	0	0	0
6	INTERCHANGE	728,014	334,225	42,945	259,096	79,692	10,140	1,917
7	OTHER	0	0	0	0	0	0	0
8	OTHER	728,014	334,225	42,945	259,096	79,692	10,140	1,917
9	TOTAL OTHER OPERATING REVENUES							
10								
11	TOTAL OPERATING REVENUES	80,721,256	37,056,223	4,778,108	28,730,482	8,825,455	1,117,512	213,475
12								

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 7

SUMMARY

	ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
OPERATING EXPENSES - 7								
OPERATION & MAINTENANCE EXPENSE								
1 OTHER POWER GENERATION								
2 OPERATION								
3 546 - OPER SUPV & ENG	LAB54750	2,777	1,357	131	1,026	229	34	0
4 547 - FUEL	EPROD	10,738	4,946	514	3,805	1,253	200	21
5 548 - GENERATION EXPENSES	PRODPIS	0	0	0	0	0	0	0
6 549 - MISC GENERATION EXP	PRODPIS	167,605	81,924	7,896	61,904	13,804	2,077	0
7 550 - RENTS	PRODPIS	0	0	0	0	0	0	0
8 550.1 - OPER SUPPLIES & EXP	PRODPIS	0	0	0	0	0	0	0
9 TOTAL OTHER PROD OPERATION		181,120	88,227	8,540	66,735	15,286	2,311	21
10 MAINTENANCE								
11 551 - MAINT SUPV & ENG	LAB55254	0	0	0	0	0	0	0
12 552 - MAINT OF STRUCTURES	PRODPIS	0	0	0	0	0	0	0
13 553 - MAINT OF ELECTRIC PLANT	EPROD	150	69	7	53	18	3	0
14 554 - MISCELLANEOUS	EPROD	0	0	0	0	0	0	0
15 554.1 - OTHER PLANT MAINT	EPROD	0	0	0	0	0	0	0
16 TOTAL OTHER PROD MAINTENANCE		150	69	7	53	18	3	0
17 TOTAL OTHER POWER GENERATION		181,270	88,296	8,547	66,788	15,303	2,314	21
18								
19 OTHER POWER SUPPLY EXPENSES								
20 555 - PURCHASED POWER								
21 DEMAND	DPROD	31,256,446	15,277,953	1,472,477	11,544,435	2,574,270	387,310	0
22 ENERGY	EPROD	18,525,254	8,532,083	886,072	6,564,158	2,162,146	344,232	36,563
23 TOTAL PURCHASED POWER		49,781,700	23,810,036	2,358,549	18,108,593	4,736,416	731,543	36,563
24 556 - LOAD DISPATCHING	DPROD	905	442	43	334	75	11	0
25 557 - OTHER	DPROD	108,291	52,932	5,102	39,997	8,919	1,342	0
26 TOTAL OTHER POWER SUPPLY		49,890,896	23,863,410	2,363,693	18,148,924	4,745,410	732,896	36,563
27								
28 DSM AND OTHER ADJUSTMENTS	OX555	108,353	51,824	5,134	39,414	10,309	1,592	80
29								
30 AUTHORIZED DSM								
31 ON-GOING DSM	DDSM	175,000	85,539	8,244	64,636	14,413	2,168	0
32 LOW INCOME PROGRAM	DLOWINC	70,000	34,216	3,298	25,854	5,765	867	0
33 RENEWABLES	DRENEW	125,000	61,099	5,889	46,168	10,295	1,549	0
34 OTHER	DDSM	195,196	95,411	9,196	72,095	16,076	2,419	0
35 TOTAL OTHER POWER SUPPLY		565,196	276,264	26,626	208,753	46,549	7,004	0
36								
37 TOTAL PRODUCTION O&M		50,745,715	24,279,795	2,404,000	18,463,879	4,817,572	743,805	36,664

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

	ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
OPERATION & MAINTENANCE EXPENSE (CONT') - 8								
1 TRANSMISSION OPERATION & MAINTENANCE								
2 OPERATION								
3 560 - OPER SUPV & ENG	LAB56167	20,353	9,948	959	7,517	1,676	252	0
4 561 - LOAD DISPATCHING	TRANPIS	75,676	36,990	3,565	27,951	6,233	938	0
5 562 - STATION EXPENSE	TRANPIS	20,034	9,792	944	7,399	1,650	248	0
6 563 - OVERHEAD LINES	TRANPIS	4,819	2,355	227	1,780	397	60	0
7 564 - UNDERGROUND LINES	TRANPIS	807	394	36	298	66	10	0
8 565 - WHEELING EXPENSES	TRANPIS	0	0	0	0	0	0	0
9 566 - MISCELLANEOUS	TRANPIS	2,551	1,247	120	942	210	32	0
10 567 - RENTS	TRANPIS	9,041	4,419	426	3,339	745	112	0
11 567.1 - SUPPLIES & EXP	TRANPIS	0	0	0	0	0	0	0
12 TOTAL TRANS OPERATION		133,281	65,147	6,279	49,227	10,977	1,652	0
13 MAINTENANCE								
14 568 - MAINT SUPV & ENG	LAB56973	0	0	0	0	0	0	0
15 569 - MAINT OF STRUCTURES	TRANPIS	14,203	6,942	669	5,246	1,170	176	0
16 570 - MAINT OF STATION EQUIP	TRANPIS	245	120	12	90	20	3	0
17 571 - MAINT OF OVERHEAD LINES	TRANPIS	2,184	1,068	103	807	180	27	0
18 572 - MAINT OF UNDERGR. LINES	TRANPIS	0	0	0	0	0	0	0
19 573 - MAINT OF MISC TRANS PLAN	TRANPIS	2,530	1,237	119	934	208	31	0
20 TOTAL TRANS MAINTENANCE		19,162	9,366	903	7,077	1,578	237	0
21 TOTAL TRANSMISSION O&M		152,443	74,513	7,182	56,304	12,555	1,889	0
22 DISTRIBUTION OPERATION & MAINTENANCE								
23 OPERATION								
24 580 - OPER SUPV & ENG	LAB58189	1,355	727	91	460	60	7	10
25 581 - LOAD DISPATCHING	DISTPIS	0	0	0	0	0	0	0
26 582 - STATION EQUIPMENT	DISTSUB	62,322	23,405	2,660	31,573	4,089	508	86
27 583 - OVERHEAD LINES	OHDIST	243,689	91,519	10,403	123,454	15,989	1,988	336
28 584 - UNDERGROUND LINES	UGDIST	61,607	23,137	2,630	31,210	4,042	503	85
29 585 - STREET LIGHTS	PLT373	1,588	0	0	0	0	0	1,588
30 586 - METERS	PLT370	141,752	112,794	15,115	11,734	1,809	257	43
31 587 - CUSTOMER INSTALLATIONS	DISTPIS	6,850	2,826	334	3,155	405	41	89
32 588 - MISCELLANEOUS	DISTPIS	383,481	158,219	18,707	176,605	22,685	2,291	4,973
33 589 - RENTS	DISTPIS	32,026	13,214	1,562	14,749	1,895	191	415
34 TOTAL DISTRIBUTION OPERATION		934,670	425,841	51,503	392,939	50,975	5,786	7,626
35 MAINTENANCE								
36 590 - MAINT SUPV & ENG	LAB59198	5,444	2,115	244	2,606	338	41	99
37 591 - MAINT OF STRUCTURES	DISTSUB	4,101	1,540	175	2,078	269	33	6
38 592 - MAINT OF STATION EQUIP	DISTSUB	177,320	66,594	7,570	89,831	11,635	1,447	244
39 593 - MAINT OF OVERHEAD LINES	OHDIST	218,499	82,059	9,328	110,692	14,336	1,783	301
40 594 - MAINT OF UNDERGR. LINES	UGDIST	88,704	33,313	3,787	44,938	5,820	724	122
41 595 - MAINT OF LINE TRANSF.	PLT368	211,482	80,077	9,102	108,019	13,990	0	294
42 596 - MAINT OF STREET LIGHTS	PLT373	73,998	0	0	0	0	0	73,998
43 597 - MAINT OF METERS	PLT370	2,982	2,373	318	247	38	5	1
44 598 - MAINT OF MISC DISTR PLAN	DISTPIS	13,743	5,670	670	6,329	813	82	178
45 TOTAL DISTRIBUTION MAINTENANCE		796,273	273,741	31,194	364,739	47,239	4,115	75,244
46 TOTAL DISTRIBUTION O&M		1,730,943	699,582	82,697	757,679	98,214	9,902	82,870

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 9

SUMMARY

	ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
1 OPERATION & MAINTENANCE EXPENSE (CONT)-9								
2 CUSTOMER ACCOUNTS EXPENSE								
3 901 - SUPERVISION	LAB90205	0	0	0	0	0	0	0
4 902 - METER READING	CMETERS	275,944	219,572	29,424	22,843	3,522	500	84
5 903 - RECORDS AND COLLECTION CBILCOL	SALESREV	540,084	435,139	58,311	45,269	209	990	167
6 904 - UNCOLLECTIBLES	SALESREV	511,068	234,627	30,148	181,886	55,944	7,119	1,345
7 905 - MISCELLANEOUS	CUST	338,329	272,587	36,528	28,358	131	620	104
8 TOTAL CUSTOMER ACCOUNTS		1,665,425	1,161,924	154,410	278,355	59,807	9,229	1,700
9								
10 CUSTOMER SERVICE AND INFORMATION								
11 907 - SUPERVISION	LAB90810	0	0	0	0	0	0	0
12 908 - CUSTOMER ASSISTANCE	CINFO	44	35	5	4	0	0	0
13 909 - INFORMATION	CINFO	39,339	31,695	4,247	3,297	15	72	12
14 910 - MISCELLANEOUS	CINFO	24,823	20,000	2,680	2,081	10	46	8
15 TOTAL CUSTOMER SVC & INFO		64,206	51,730	6,932	5,382	25	118	20
16								
17 SALES EXPENSES								
18 911 - SUPERVISION	LAB91217	10,913	8,792	1,178	915	4	20	3
19 912 - DEMO AND SELLING	CUST	7,447	6,000	804	624	3	14	2
20 913 - ADVERTISING								
21 SAFETY	CUST	0	0	0	0	0	0	0
22 DSM	CDSM	0	0	0	0	0	0	0
23 ENVIRONMENTAL	CENVIRON	0	0	0	0	0	0	0
24 OTHER	CUST	80,717	65,033	8,715	6,766	31	148	25
25 TOTAL ACCOUNT 913		80,717	65,033	8,715	6,766	31	148	25
26 914 - MISCELLANEOUS	CUST	0	0	0	0	0	0	0
27 TOTAL SALES EXPENSES		99,077	79,825	10,697	8,304	38	182	31
28								
29 ADMINISTRATIVE & GENERAL EXPENSES								
30 920 - SALARIES	LABXAG	0	0	0	0	0	0	0
31 921 - OFFICE SUPPLIES & EXP	LABXAG	475,708	233,078	28,425	182,726	23,818	2,724	4,937
32 922 - CR. TRANSFER	LABXAG	0	0	0	0	0	0	0
33 923 - OUTSIDE SERVICES	LABXAG	3,026,966	1,483,096	180,872	1,162,697	151,556	17,332	31,414
34 924 - PROPERTY INSURANCE								
35 PRODUCTION	PRODPIS	0	0	0	0	0	0	0
36 TRANSMISSION	TRANPIS	0	0	0	0	0	0	0
37 DISTRIBUTION	DISTPIS	0	0	0	0	0	0	0
38 OTHER	TOTPIS	270,113	115,835	13,080	119,143	17,315	1,983	2,756
39 TOTAL PROPERTY INSURANCE		270,113	115,835	13,080	119,143	17,315	1,983	2,756
40 925 - INJURIES & DAMAGES	LABXAG	282,703	138,513	16,892	108,590	14,155	1,619	2,934
41 926 - PENSIONS & BENEFITS	LABXAG	611,272	299,500	36,526	234,798	30,606	3,500	6,344
42 927 - FRANCHISE REQUIREMENTS	TOTPIS	0	0	0	0	0	0	0
43 928 - REGULATORY EXPENSES	TOTPIS	(262,109)	(112,402)	(12,693)	(115,613)	(16,802)	(1,925)	(2,674)
44 929 - DUPLICATE CHARGES	TOTPIS	0	0	0	0	0	0	0
45 930 - MISC. BD. ADJ.	TOTPIS	247,916	106,316	12,005	109,352	15,892	1,820	2,530
46 931 - RENTS	TOTPIS	190,683	81,772	9,234	84,100	12,223	1,400	1,946
47 932 - TRANSPORTATION EXP	TOTPIS	0	0	0	0	0	0	0
48 933 - MAINTENANCE	TOTPIS	85,611	36,713	4,146	37,762	5,488	629	874
49 TOTAL A&G EXPENSES		4,928,863	2,382,421	288,488	1,923,563	254,251	29,082	51,059
50 PAYROLL EXPENSE ADJUSTMENT	LABXAG	(22,686)	(11,120)	(1,356)	(6,718)	(1,136)	(130)	(236)
51 TOTAL OPERATION & MAINTENANCE EXP		59,363,976	28,718,670	2,953,049	21,484,748	5,241,325	794,076	172,107

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 10

SUMMARY

	ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
OPERATING EXPENSE (CONT.) - 10								
OPERATION & MAINTENANCE - LABOR ONLY								
1 OTHER POWER GENERATION								
2 OPERATION								
3 546 - OPER SUPV & ENG	OX546	0	0	0	0	0	0	0
4 547 - FUEL	OX547	0	0	0	0	0	0	0
5 548 - GENERATION EXPENSES	OX548	0	0	0	0	0	0	0
6 549 - MISC GENERATION EXP	OX549	134,287	65,639	6,326	49,598	11,060	1,664	0
7 550 - RENTS	OX550	0	0	0	0	0	0	0
8 550.1 - OPER SUPPLIES & EXP	OX5501	0	0	0	0	0	0	0
9 TOTAL OTHER PROD OPERATION		134,287	65,639	6,326	49,598	11,060	1,664	0
10 MAINTENANCE								
11 551 - MAINT SUPV & ENG	MX551	0	0	0	0	0	0	0
12 552 - MAINT OF STRUCTURES	MX552	0	0	0	0	0	0	0
13 553 - MAINT OF ELECTRIC PLANT	MX553	0	0	0	0	0	0	0
14 554 - MISCELLANEOUS	MX554	0	0	0	0	0	0	0
15 554.1 - OTHER PLANT MAINT	MX5541	0	0	0	0	0	0	0
16 TOTAL OTHER PROD MAINTENANCE		0	0	0	0	0	0	0
17 TOTAL OTHER POWER GENERATION LABOR		134,287	65,639	6,326	49,598	11,060	1,664	0
18								
19 OTHER POWER SUPPLY EXPENSES								
20 555 - PURCHASED POWER	OX555	0	0	0	0	0	0	0
21 556 - LOAD DISPATCHING	OX556	0	0	0	0	0	0	0
22 557 - OTHER	OX557	0	0	0	0	0	0	0
23 TOTAL OTHER POWER SUPPLY LABOR		0	0	0	0	0	0	0
24								
25 TOTAL PRODUCTION O&M LABOR		134,287	65,639	6,326	49,598	11,060	1,664	0
26								
27								
TRANSMISSION OPERATION & MAINTENANCE LABOR								
28 OPERATION								
29 560 - OPER SUPV & ENG	OX560	17,047	8,332	803	6,296	1,404	211	0
30 561 - LOAD DISPATCHING	OX561	0	0	0	0	0	0	0
31 562 - STATION EXPENSE	OX562	4,638	2,267	218	1,713	382	57	0
32 563 - OVERHEAD LINES	OX563	5,237	2,560	247	1,934	431	65	0
33 564 - UNDERGROUND LINES	OX564	0	0	0	0	0	0	0
34 565 - WHEELING EXPENSES	OX565	0	0	0	0	0	0	0
35 566 - MISCELLANEOUS	OX566	274	134	13	101	23	3	0
36 567 - RENTS	OX567	0	0	0	0	0	0	0
37 567.1 - SUPPLIES & EXP	OX5671	0	0	0	0	0	0	0
38 TOTAL TRANS OPERATION		27,196	13,293	1,281	10,045	2,240	337	0
39 MAINTENANCE								
40 568 - MAINT SUPV & ENG	MX568	0	0	0	0	0	0	0
41 569 - MAINT OF STRUCTURES	MX569	0	0	0	0	0	0	0
42 570 - MAINT OF STATION EQUIP	MX570	6,767	3,308	319	2,499	557	84	0
43 571 - MAINT OF OVERHEAD LINES	MX571	1,644	804	77	607	135	20	0
44 572 - MAINT OF UNDERGR. LINES	MX572	0	0	0	0	0	0	0
45 573 - MAINT OF MISC TRANS PLAN	MX573	57	28	3	21	5	1	0
46 TOTAL TRANS MAINTENANCE		8,468	4,139	399	3,128	697	105	0
47								
48 TOTAL TRANSMISSION O&M LABOR		35,664	17,432	1,680	13,172	2,937	442	0

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 11

SUMMARY

OPERATING EXPENSE (CONT'D) - 11 OPERATION & MAINTENANCE - LABOR ONLY		ALLOC						
		TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
1	DISTRIBUTION OPERATION & MAINTENANCE LABOR							
2	OPERATION							
3	580 - OPER SUPV & ENG LAB58189	1,555	834	105	527	69	8	12
4	581 - LOAD DISPATCHING OX581	0	0	0	0	0	0	0
5	582 - STATION EQUIPMENT OX582	1,528	574	65	774	100	12	2
6	583 - OVERHEAD LINES OX583	74,378	27,933	3,175	37,680	4,880	607	102
7	584 - UNDERGROUND LINES OX584	54,105	20,320	2,310	27,410	3,550	441	75
8	585 - STREET LIGHTS OX585	1,135	0	0	0	0	0	1,135
9	586 - METERS OX586	163,896	130,414	17,476	13,567	2,092	297	50
10	587 - CUSTOMER INSTALLATIONS OX587	67,202	27,727	3,278	30,949	3,975	401	872
11	588 - MISCELLANEOUS OX588	102,762	42,398	5,013	47,325	6,079	614	1,333
12	589 - RENTS OX589	0	0	0	0	0	0	0
13	TOTAL DISTRIBUTION OPERATION MAINTENANCE	466,561	250,199	31,422	158,233	20,746	2,381	3,580
14	590 - MAINT SUPV & ENG LAB59198	15,898	6,176	714	7,610	987	120	291
15	591 - MAINT OF STRUCTURES MX591	0	0	0	0	0	0	0
16	592 - MAINT OF STATION EQUIP MX592	111,870	42,014	4,776	56,674	7,340	913	154
17	593 - MAINT OF OVERHEAD LINES MX593	304,181	114,237	12,985	154,099	19,958	2,482	419
18	594 - MAINT OF UNDERGR. LINES MX594	63,008	23,663	2,690	31,920	4,134	514	87
19	595 - MAINT OF LINE TRANSF. MX595	10,943	4,144	471	5,589	724	0	15
20	596 - MAINT OF STREET LIGHTS MX596	8,872	0	0	0	0	0	8,872
21	597 - MAINT OF METERS MX597	23,908	19,024	2,549	1,979	305	43	7
22	598 - MAINT OF MISC DISTR PLAN MX598	262	108	13	121	15	2	3
23	TOTAL DISTRIBUTION MAINTENANCE	538,942	209,365	24,198	257,992	33,464	4,074	9,849
24								
25	TOTAL DISTRIBUTION O&M LABOR	1,005,503	459,565	55,620	416,225	54,210	6,455	13,429
26								
27	CUSTOMER ACCOUNTS LABOR							
28	901 - SUPERVISION LAB90205	26,717	21,454	2,875	2,232	100	49	8
29	902 - METER READING OX902	166,509	132,493	17,755	13,784	2,125	302	51
30	903 - RECORDS AND COLLECTION OX903	450,474	362,941	48,656	37,758	175	826	139
31	904 - UNCOLLECTIBLES OX904	0	0	0	0	0	0	0
32	905 - MISCELLANEOUS OX905	0	0	0	0	0	0	0
33	TOTAL CUSTOMER ACCOUNTS LABOR	643,700	516,888	69,265	53,773	2,400	1,176	198
34								
35	CUSTOMER SERVICE AND INFORMATION LABOR							
36	907 - SUPERVISION OX907	0	0	0	0	0	0	0
37	908 - CUSTOMER ASSISTANCE OX908	0	0	0	0	0	0	0
38	909 - INFORMATION OX909	0	0	0	0	0	0	0
39	910 - MISCELLANEOUS OX910	37,046	29,847	4,000	3,105	14	68	11
40	TOTAL CUSTOMER SVC & INFO LABOR	37,046	29,847	4,000	3,105	14	68	11
41								
42								

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

OPERATING EXPENSE (CON'T) - 12 OPERATION & MAINTENANCE - LABOR ONLY		ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
1	SALES EXPENSE LABOR								
2	911 - SUPERVISION	OX911	0	0	0	0	0	0	0
3	912 - DEMO AND SELLING	OX912	0	0	0	0	0	0	0
4	913 - ADVERTISING	OX913	1,348	1,086	146	113	1	2	0
5	914 - MISCELLANEOUS	OX914	2,649	2,134	286	222	1	5	1
6	TOTAL SALES EXPENSE LABOR		3,997	3,220	432	335	2	7	1
7									
8	ADMINISTRATIVE & GENERAL LABOR								
9	920 - SALARIES	OX920	0	0	0	0	0	0	0
10	921 - OFFICE SUPPLIES & EXP	OX921	0	0	0	0	0	0	0
11	922 - CR. TRANSFER	OX922	0	0	0	0	0	0	0
12	923 - OUTSIDE SERVICES	OX923	0	0	0	0	0	0	0
13	924 - PROPERTY INSURANCE	OX924	0	0	0	0	0	0	0
14	925 - INJURIES & DAMAGES	OX925	0	0	0	0	0	0	0
15	926 - PENSIONS & BENEFITS	OX926	0	0	0	0	0	0	0
16	927 - FRANCHISE REQUIREMENTS	OX927	0	0	0	0	0	0	0
17	928 - REGULATORY EXPENSES	OX928	0	0	0	0	0	0	0
18	929 - DUPLICATE CHARGES	OX929	0	0	0	0	0	0	0
19	930 - MISC. BD. ADJ.	OX930	7,223	3,097	350	3,186	463	53	74
20	931 - RENTS	OX931	0	0	0	0	0	0	0
21	933 - TRANSPORTATION EXP	OX933	0	0	0	0	0	0	0
22	935 - MAINTENANCE	OX935	0	0	0	0	0	0	0
23	TOTAL A&G LABOR		7,223	3,097	350	3,186	463	53	74
24									
25	CAPITALIZED LABOR								
26	PRODUCTION	PRODPPIS	320	156	15	118	26	4	0
27	TRANSMISSION	TRANPPIS	38,194	18,669	1,799	14,107	3,146	473	0
28	DISTRIBUTION	DISTPPIS	2,340,852	965,805	114,191	1,078,038	138,474	13,985	30,359
29	GENERAL	GENLPPIS	14,826	6,358	718	6,540	950	109	151
30	TOTAL CAPITALIZED LABOR		2,394,192	990,988	116,724	1,098,802	142,596	14,572	30,510
31									
32	TOTAL OPERATION & MAINT LABOR		4,261,612	2,086,677	254,396	1,638,197	213,682	24,437	44,223

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

	ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
OPERATING EXPENSES (CONT') - 13								
1 DEPRECIATION EXPENSE								
2 PRODUCTION	PRODPIS	227,501	111,201	10,717	84,027	18,737	2,819	0
3 TRANSMISSION	TRANPIS	648,356	316,912	30,544	239,468	53,398	8,034	0
4 DISTRIBUTION		0	0	0	0	0	0	0
5 360 - LAND & LAND RIGHTS	PLT360	0	0	580	6,882	891	111	19
6 361 - STRUCTURES & IMPROV.	PLT361	13,585	5,102	21,293	252,684	32,727	4,069	687
7 362 - STATION EQUIPMENT	PLT362	498,780	187,320	52,556	623,692	80,778	10,045	1,697
8 364 - POLES, TOWERS & FIXTURES	PLT364	1,231,126	462,358	38,990	462,702	59,927	7,452	1,259
9 365 - OVHD CONDUCTOR & DEVICE	PLT365	913,341	343,012	5,760	68,352	8,853	1,101	186
10 366 - UDGR CONDUCTOR & DEVICE	PLT366	134,923	50,671	16,011	190,000	24,608	3,060	517
11 367 - UDGR CONDUIT	PLT367	375,047	140,852	40,516	480,812	62,273	0	1,308
12 368 - LINE TRANSFORMER	PLT368	941,346	356,437	28,427	20,952	101	458	77
13 369 - SERVICE DROP	PLT369	251,471	201,456	15,606	12,115	1,868	265	45
14 370 - METERS	PLT370	146,357	116,458	0	0	0	0	0
15 371 - INSTAL. ON CUST. PREMISE	PLT371	0	0	0	0	0	0	0
16 373 - STREET LIGHTS	PLT373	50,646	0	0	0	272,026	26,561	50,646
17 TOTAL DISTRIBUTION DEPR RESV.		4,556,622	1,863,667	219,738	2,118,191	80,244	9,192	56,440
18 GENERAL		1,251,788	536,815	60,618	552,147			12,773
19 TOTAL DEPRECIATION EXPENSE	GENLPIS	6,684,267	2,828,594	321,617	2,993,832	424,406	46,606	69,212
20								
21 TAXES OTHER THAN INCOME TAXES								
22 PROPERTY	TOTPIS	3,698,765	1,586,172	179,114	1,631,475	237,105	27,160	37,740
23 PAYROLL	LABXAG	191,810	93,979	11,461	73,677	9,604	1,098	1,991
24 FRANCHISE TAX	SALESREV	0	0	0	0	0	0	0
25 REGULATORY & OTHER	SALESREV	396	182	23	141	43	6	1
26 TOTAL TAXES OTHER THAN INC. TAXES		3,890,971	1,680,333	190,599	1,705,292	246,752	28,263	39,732
27								
28 TOTAL EXPENSES BEF INCOME TAXES		69,939,214	33,227,598	3,465,265	26,183,872	5,912,483	868,946	281,051
29 OPERATING INCOME BEF INCOME TAXES		10,782,042	3,828,626	1,312,843	2,546,610	2,912,972	248,566	(67,575)

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 14

SUMMARY

	ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
OPERATING EXPENSES (CONT) - 14								
1 INCOME TAXES								
2								
3 TOTAL OPERATING REVENUE		80,721,256	37,056,223	4,778,108	28,730,482	8,825,455	1,117,512	213,475
4								
5 LESS:								
6 O&M EXPENSES		59,363,976	28,718,670	2,953,049	21,484,748	5,241,325	794,076	172,107
7 DEPRECIATION		6,684,267	2,828,594	321,617	2,993,832	424,406	46,606	69,212
8 TAXES OTHER		3,890,971	1,680,333	190,599	1,705,292	246,752	28,263	39,732
9								
10 TAXABLE INCOME		10,782,042	3,826,626	1,312,843	2,546,610	2,912,972	248,566	(67,575)
11								
12 LESS:								
13 INTEREST		2,574,809	1,104,177	124,686	1,135,713	165,055	18,907	26,272
14	TOTPIS							
15 STATE TAXABLE INCOME		8,207,233	2,724,449	1,188,157	1,410,897	2,747,917	229,660	(93,847)
16 TOTAL STATE INCOME TAX		677,917	225,039	98,142	116,540	226,978	18,970	(7,752)
17								
18								
19 FEDERAL TAXABLE INCOME		7,529,316	2,499,410	1,090,015	1,294,357	2,520,939	210,690	(66,095)
20								
21 FEDERAL INCOME TAX		2,569,002	852,799	371,913	441,635	860,144	71,887	(29,376)
22 ITC	TOTPIS	203,304	87,185	9,845	89,675	13,033	1,493	2,074
23 DEF INC TAX	TOTPIS	33,469	14,353	1,621	14,763	2,145	246	341
24								
25 TOTAL FEDERAL INCOME TAX		2,332,229	751,261	360,447	337,197	844,966	70,149	(31,792)
26								
27 TOTAL INCOME TAXES		3,010,147	976,301	458,589	453,737	1,071,944	89,119	(39,543)
28								
29								
30								
31 STATE TAX RATE ARIZONA		8.260%						
32 FEDERAL TAX RATE - CURRENT		34.12%						
33 1 - EFFECTIVE TAX RATE		0.6044						
34 EFFECTIVE TAX RATE		0.3956						
35 FACTOR FOR TAXABLE BASIS		1.6546						
AMOUNT USED IN TAX CALC		1.66000						
RATE FILING FACTOR		1.70110						
ORDER		1.66000						

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 15

SUMMARY

ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
1 RATE BASE	90,369,010	39,345,364	4,392,186	39,139,060	5,707,502	676,161	1,108,736
2 NET OPERATING INCOME	7,771,895	2,852,325	854,254	2,092,873	1,841,028	159,448	(28,032)
3 RATE OF RETURN	8.60%	7.25%	19.45%	5.35%	32.26%	23.58%	-2.53%
4 RELATIVE RATE OF RETURN	1.00	0.84	2.26	0.62	3.75	2.74	-0.29
5 SALES OF ELECTRICITY REVENUE	79,993,242	36,721,999	4,735,163	28,471,387	8,745,763	1,107,372	211,559
6 TOTAL ANNUAL BILLED KWH	957,612,935	441,042,985	45,803,066	339,316,393	111,766,324	17,794,167	1,890,000
7 REVENUE (CENTS/KWH)	8.353	8.326	10.338	8.391	7.825	6.223	11.194
8 TOTAL ANNUAL BILLED KW	1,422,112	0	0	1,093,426	280,375	68,311	0
9 REVENUE (\$/KW)	\$56.25	\$0.00	\$0.00	\$26.04	\$33.59	\$16.21	\$0.00
10 AVERAGE ANNUAL CUSTOMERS	683,016	598,442	47,173	36,622	96	454	229
11 REVENUE (\$/MO/CUST)	\$117.12	\$61.36	\$100.38	\$777.44	\$91,101.70	\$2,439.14	\$923.84

CURRENT RATE LEVELS @ UNIFORM RATE OF RETURN

12 RATE OF RETURN	9.90%	9.90%	9.90%	9.90%	9.90%	9.90%	9.90%
13 REQUIRED INCOME	8,944,117	3,894,139	434,709	3,873,721	564,890	66,922	109,735
14 REQUIRED SALES OF ELECT REVENUE	81,939,130	38,451,411	4,038,719	31,427,594	6,627,375	953,779	440,252
15 REVENUE DEFICIENCY	1,945,888	1,729,412	(696,444)	2,956,208	(2,118,389)	(153,593)	228,693
16 PERCENT INCREASE REQUIRED	2.43%	4.71%	-14.71%	10.38%	-24.22%	-13.87%	108.10%
17 TOTAL ANNUAL BILLED KWH	957,612,935	441,042,985	45,803,066	339,316,393	111,766,324	17,794,167	1,890,000
18 REVENUE (CENTS/KWH)	8.557	8.718	8.818	9.262	5.930	5.360	23.294
19 REV DEFICIENCY PER BILLING UNIT	0.203	0.392	(1.521)	0.871	(1.895)	(0.863)	12.100
20 TOTAL ANNUAL BILLED KW	1,422,112	0	0	1,093,426	280,375	68,311	0
21 REVENUE (\$/KW)	\$57.62	\$0.00	\$0.00	\$28.74	\$25.45	\$13.96	\$0.00
22 REV DEFIC PER BILLING UNIT	\$1.37	\$0.00	\$0.00	\$2.70	(\$8.14)	(\$2.25)	\$0.00
23 AVERAGE ANNUAL CUSTOMERS	683,016	598,442	47,173	36,622	96	454	229
24 REVENUE REQUIRED (\$/MO/CUST)	\$119.97	\$64.25	\$85.62	\$858.16	\$69,035.15	\$2,100.83	\$1,922.50
25 REV DEFIC PER BILLING UNIT	\$2.85	\$2.89	(\$14.76)	\$80.72	(\$22,066.54)	(\$338.31)	\$998.66

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 16

SUMMARY

ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
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REVENUE REQUIREMENTS CONTINUED -16

CURRENT RATE LEVELS

1	SALES OF ELECTRICITY REVENUE	81,939,129	37,491,956	4,847,544	29,250,010	8,986,394	1,146,931	216,294
2	INCREASE IN SALES OF ELECTRICITY	1,945,887	769,957	112,381	778,623	240,631	39,559	4,735
3	PERCENT INCREASE	2.43%	2.10%	2.37%	2.73%	2.75%	3.57%	2.24%
4	RATE BASE	90,369,010	39,345,364	4,392,186	39,139,060	5,707,502	676,161	1,108,736
5	INCOME	8,944,116	3,316,155	921,953	2,561,923	1,985,986	183,279	(25,179)
6	PROPOSED RATE OF RETURN	9.90%	8.43%	20.99%	6.55%	34.80%	27.11%	-2.27%
7	TOTAL ANNUAL BILLED KWH	957,612,935	441,042,985	45,803,066	339,316,393	111,766,324	17,794,167	1,890,000
8	REVENUE (CENTS/KWH)	8.56	8.50	10.58	8.62	8.04	6.45	11.44
9	REV DEFICIENCY PER BILLING UNIT	2.03	1.75	2.45	2.29	2.15	2.22	2.51
10	TOTAL ANNUAL BILLED KW	1,422,112	0	0	1,093,426	260,375	68,311	0
11	REVENUE (\$/KW)	\$57.62	\$0.00	\$0.00	\$26.75	\$34.51	\$16.79	\$0.00
12	REV DEFIC PER BILLING UNIT	\$1.37	\$0.00	\$0.00	\$0.71	\$0.92	\$0.58	\$0.00
13	TOTAL ANNUAL CUSTOMERS	683,016	598,442	47,173	36,622	96	454	229
14	REVENUE (\$/MO/CUST)	\$119.97	\$62.65	\$102.76	\$798.70	\$93,608.27	\$2,526.28	\$944.52
15	REV DEFIC PER BILLING UNIT	\$2.85	\$1.29	\$2.38	\$21.26	\$2,506.57	\$87.14	\$20.66

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 17

SUMMARY

ALLOCATION FACTOR TABLE - 17

CAPACITY-PRODUCTION RELATED

ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
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1 DEMAND PRODUCTION	DPROD	241,151	117,873	11,361	89,068	19,861	2,988	0
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CAPACITY-TRANSMISSION RELATED

1 DEMAND TRANSMISSION (WAPA)	DTRAN	241,151	117,873	11,361	89,068	19,861	2,988	0
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CAPACITY-SUBTRANSMISSION

1 DEMAND SUBTRANSMISSION	DTRANSUB	241,151	117,873	11,361	89,068	19,861	2,988	0
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CAPACITY-DISTRIBUTION RELATED

1 DIST - PRI DIST SUBSTATIONS	DDISPSUB	355,686	133,580	15,184	180,192	23,338	2,902	490
2 DIST - PRIMARY OVERHEAD LINES	DDISTPOL	355,686	133,580	15,184	180,192	23,338	2,902	490
3 DIST - PRIMARY UNDERGROUND LINES	DDISTPUL	355,686	133,580	15,184	180,192	23,338	2,902	490
4 DIST - SEC DIST SUBSTATIONS	DDISSUB	355,686	133,580	15,184	180,192	23,338	2,902	490
5 DIST - SECONDARY OVERHEAD LINES	DDISTSOL	352,784	133,580	15,184	180,192	23,338	0	490
6 DIST - SECONDARY UNDERGROUND LINES	DDISTSUL	352,784	133,580	15,184	180,192	23,338	0	490
7 DIST - OVERHEAD LINE TRANSFORMERS	DDISTSOT	352,784	133,580	15,184	180,192	23,338	0	490
8 DIST - UNDERGROUND LINE TRANSFORMERS	DDISTSUT	352,784	133,580	15,184	180,192	23,338	0	490
9 DIST - OVERHEAD SERVICES	DDISTSOS	747,246	598,628	84,470	62,257	300	1,362	229
10 DIST - UNDERGROUND SERVICES	DDISTSUS	747,246	598,628	84,470	62,257	300	1,362	229
11 DIST - STREET LIGHTING	DDISTLTG	1	0	0	0	0	0	1

CAPACITY-SYSTEM BENEFIT RELATED

1 DEMAND RENEWABLE	DRENEW	241,151	117,873	11,361	89,068	19,861	2,988	0
2 DEMAND DSM	DDSM	241,151	117,873	11,361	89,068	19,861	2,988	0
3 DEMAND ENVIRONMENTAL	DENVIRON	241,151	117,873	11,361	89,068	19,861	2,988	0
4 DEMAND LOW INCOME	DLOWINC	241,151	117,873	11,361	89,068	19,861	2,988	0

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 19

SUMMARY

ALLOCATION FACTOR TABLE (CONT) - 19 INTERNALLY DEVELOPED	ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
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1 PLANT IN SERVICE EXCL GENERAL	PISXGENL	158,595,048	68,011,618	7,680,023	69,954,113	10,166,534	1,164,549	1,618,211
2 TOTAL PLANT IN SERVICE	TOTPIS	174,431,751	74,803,002	8,446,921	76,939,466	11,181,726	1,280,837	1,779,799
3 PRODUCTION PLANT IN SERVICE	PRODPIS	11,816,774	5,775,964	556,663	4,364,475	973,225	146,426	0
4 TRANSMISSION PLANT IN SERVICE	TRAMPIS	22,004,134	10,755,482	1,036,605	8,127,133	1,812,253	272,661	0
5 DISTRIBUTION PLANT IN SERVICE	DISTPIS	124,774,140	51,480,172	6,086,734	57,462,505	7,381,056	745,462	1,618,211
6 OVERHEAD DISTRIBUTION PIS	OHDIST	62,603,072	23,511,028	2,672,484	31,714,921	4,107,588	510,771	86,271
7 UNDERGROUND DISTRIBUTION PIS	UGDIST	13,494,800	5,068,068	576,066	6,836,510	885,437	110,102	18,597
8 DISTRIBUTION SUBSTATIONS	DISTSUB	12,586,184	4,726,831	537,298	6,376,202	825,820	102,689	17,344
9 TOTAL TRANSMISSION & DISTRIBUTION	TDPIT	146,778,274	62,235,654	7,123,340	65,589,638	9,193,309	1,018,123	1,618,211
10 GENERAL PLANT	GENLPLS	13,129,201	5,630,303	635,766	5,791,111	841,631	96,407	133,963
11 BASE RATE SALES REVENUE	SALESREV	81,464,701	37,399,701	4,805,544	28,992,777	8,917,502	1,134,714	214,463
12 TOTAL O&M LESS FUEL & PP	OM	9,571,538	4,903,688	593,987	3,372,350	503,656	62,334	135,523
13 ACCOUNT 360	PLT360	328,395	123,331	14,019	166,366	21,547	2,679	453
14 ACCOUNT 361	PLT361	468,769	176,050	20,012	237,480	30,757	3,825	646
15 ACCOUNT 362	PLT362	11,789,020	4,427,450	503,267	5,972,356	773,515	96,185	16,246
16 ACCOUNT 364	PLT364	36,856,057	13,841,554	1,573,367	18,671,399	2,418,244	300,704	50,790
17 ACCOUNT 365	PLT365	25,747,015	9,669,474	1,099,127	13,043,522	1,689,344	210,067	35,481
18 ACCOUNT 366	PLT366	3,792,952	1,424,470	161,919	1,921,522	248,868	30,946	5,227
19 ACCOUNT 367	PLT367	9,701,848	3,643,598	414,167	4,914,988	636,569	79,156	13,370
20 ACCOUNT 368	PLT368	22,561,271	8,550,317	971,913	11,533,849	1,493,817	0	31,374
21 ACCOUNT 369	PLT369	6,907,352	5,533,561	780,815	575,492	2,778	12,590	2,117
22 ACCOUNT 370	PLT370	5,140,518	4,090,368	548,129	425,531	65,616	9,309	1,565
23 ACCOUNT 371	PLT371	0	0	0	0	0	0	0
24 ACCOUNT 373	PLT373	1,460,943	0	0	0	0	0	1,460,943

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

ALLOCATION FACTOR TABLE (CONT'D) - 20 INTERNALLY DEVELOPED		TOTAL						
ALLOC		AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
1	ACCOUNT 546	OX546	2,777	1,357	131	1,026	229	34
2	ACCOUNT 547	OX547	10,738	4,946	514	3,805	1,253	200
3	ACCOUNT 548	OX548	0	0	0	0	0	0
4	ACCOUNT 549	OX549	167,605	81,924	7,896	61,904	13,804	2,077
5	ACCOUNT 550	OX550	0	0	0	0	0	0
6	ACCOUNT 550.1	OX550.1	0	0	0	0	0	0
7	LABOR ACCOUNTS 547 - 550.1	LAB54750	134,287	65,639	6,326	49,598	11,060	1,664
8	ACCOUNT 551	MX551	0	0	0	0	0	0
9	ACCOUNT 552	MX552	0	0	0	0	0	0
10	ACCOUNT 553	MX553	150	69	7	53	18	3
11	ACCOUNT 554	MX554	0	0	0	0	0	0
12	ACCOUNT 554.1	MX554.1	0	0	0	0	0	0
13	LABOR ACCOUNTS 552 - 554.1	LAB55254	0	0	0	0	0	0
14	ACCOUNT 555	OX555	49,781,700	23,810,036	2,358,549	18,108,593	4,736,416	731,543
15	ACCOUNT 556	OX556	905	442	43	334	75	11
16	ACCOUNT 557	OX557	108,291	52,932	5,102	39,997	8,919	1,342
17	ACCOUNT 560	OX560	20,353	9,948	959	7,517	1,676	252
18	ACCOUNT 561	OX561	75,676	36,990	3,565	27,951	6,233	938
19	ACCOUNT 562	OX562	20,034	9,792	944	7,399	1,650	248
20	ACCOUNT 563	OX563	4,819	2,355	227	1,780	397	60
21	ACCOUNT 564	OX564	807	394	38	298	66	10
22	ACCOUNT 565	OX565	0	0	0	0	0	0
23	ACCOUNT 566	OX566	2,551	1,247	120	942	210	32
24	ACCOUNT 567	OX567	9,041	4,419	426	3,339	745	112
25	ACCOUNT 567.1	OX567.1	0	0	0	0	0	0
26	LABOR ACCOUNTS 561 - 567.1	LAB56167	10,149	4,961	478	3,748	836	126
27	ACCOUNT 568	MX568	0	0	0	0	0	0
28	ACCOUNT 569	MX569	14,203	6,942	669	5,246	1,170	176
29	ACCOUNT 570	MX570	245	120	12	90	20	3
30	ACCOUNT 571	MX571	2,184	1,068	103	807	180	27
31	ACCOUNT 572	MX572	0	0	0	0	0	0
32	ACCOUNT 573	MX573	2,530	1,237	119	934	208	31
33	LABOR ACCOUNTS 569 - 573	LAB56973	8,468	4,139	399	3,128	697	105
34	ACCOUNT 580	OX580	1,355	727	91	460	60	7
35	ACCOUNT 581	OX581	0	0	0	0	0	0
36	ACCOUNT 582	OX582	62,322	23,405	2,660	31,573	4,089	508
37	ACCOUNT 583	OX583	243,689	91,519	10,403	123,454	15,969	1,988
38	ACCOUNT 584	OX584	61,607	23,137	2,630	31,210	4,042	503
39	ACCOUNT 585	OX585	1,588	0	0	0	0	0
40	ACCOUNT 586	OX586	141,752	112,794	15,115	11,734	1,809	257

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 21

SUMMARY

ALLOCATION FACTOR TABLE (CONT.) - 21 INTERNALLY DEVELOPED CONT		ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
1	ACCOUNT 587	OX587	6,850	2,826	334	3,155	405	41	89
2	ACCOUNT 588	OX588	383,481	158,219	18,707	176,605	22,685	2,291	4,973
3	ACCOUNT 589	OX589	32,026	13,214	1,562	14,749	1,895	191	415
4	LABOR ACCOUNTS 581 - 589	LAB58189	465,006	249,365	31,317	157,705	20,677	2,373	3,568
5	ACCOUNT 590	MX590	5,444	2,115	244	2,606	338	41	99
6	ACCOUNT 591	MX591	4,101	1,540	175	2,078	269	33	6
7	ACCOUNT 592	MX592	177,320	66,594	7,570	89,831	11,635	1,447	244
8	ACCOUNT 593	MX593	218,499	82,059	9,328	110,692	14,336	1,783	301
9	ACCOUNT 594	MX594	88,704	33,313	3,787	44,938	5,820	724	122
10	ACCOUNT 595	MX595	211,482	80,077	9,102	108,019	13,990	0	294
11	ACCOUNT 596	MX596	73,998	0	0	0	0	0	73,998
12	ACCOUNT 597	MX597	2,982	2,373	318	247	38	5	1
13	ACCOUNT 598	MX598	13,743	5,670	670	6,329	813	82	178
14	LABOR ACCOUNTS 591 - 598	LAB59198	523,044	203,189	23,484	250,382	32,477	3,953	9,558
15	ACCOUNT 901	OX901	0	0	0	0	0	0	0
16	ACCOUNT 902	OX902	275,944	219,572	29,424	22,843	3,522	500	84
17	ACCOUNT 903	OX903	540,084	435,139	58,311	45,269	209	990	167
18	ACCOUNT 904	OX904	511,068	234,627	30,148	181,886	55,944	7,119	1,345
19	ACCOUNT 905	OX905	338,329	272,587	36,528	28,358	131	620	104
20	LABOR ACCOUNTS 902 - 905	LAB90205	616,983	495,434	66,391	51,541	2,300	1,128	190
21	ACCOUNT 907	OX907	0	0	0	0	0	0	0
22	ACCOUNT 908	OX908	44	35	5	4	0	0	0
23	ACCOUNT 909	OX909	39,339	31,695	4,247	3,297	15	72	12
24	ACCOUNT 910	OX910	24,823	20,000	2,680	2,081	10	46	8
25	LABOR ACCOUNT 908 - 910	LAB90810	37,046	29,847	4,000	3,105	14	68	11
26	ACCOUNT 911	OX911	10,913	8,792	1,178	915	4	20	3
27	ACCOUNT 912	OX912	7,447	6,000	804	624	3	14	2
28	ACCOUNT 913	OX913	80,717	65,033	8,715	6,766	31	148	25
29	ACCOUNT 914	OX914	0	0	0	0	0	0	0
30	LABOR ACCOUNT 912 - 917	LAB91217	3,997	3,220	432	335	2	7	1
31	ACCOUNT 920	OX920	0	0	0	0	0	0	0
32	ACCOUNT 921	OX921	475,708	233,078	28,425	182,726	23,818	2,724	4,937
33	ACCOUNT 922	OX922	0	0	0	0	0	0	0
34	ACCOUNT 923	OX923	3,026,966	1,483,096	180,872	1,162,697	151,556	17,332	31,414
35	ACCOUNT 924	OX924	270,113	115,835	13,080	119,143	17,315	1,983	2,756
36	ACCOUNT 925	OX925	282,703	138,513	16,892	108,590	14,155	1,619	2,934
37	ACCOUNT 926	OX926	611,272	299,500	36,526	234,798	30,606	3,500	6,344
38	ACCOUNT 927	OX927	0	0	0	0	0	0	0
39	ACCOUNT 928	OX928	(262,109)	(112,402)	(12,693)	(115,613)	(16,802)	(1,925)	(2,674)
40	ACCOUNT 929	OX929	0	0	0	0	0	0	0

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
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ALLOCATION FACTOR TABLE (CONT) - 22
INTERNALLY DEVELOPED CONT

1	ACCOUNT 930	OX930	247,916	106,316	12,005	109,352	15,892	1,820	2,530
2	ACCOUNT 931	OX931	190,663	81,772	9,234	84,108	12,223	1,400	1,946
3	ACCOUNT 933	OX933	0	0	0	0	0	0	0
4	ACCOUNT 935	OX935	85,611	36,713	4,146	37,762	5,488	629	874
5	LABOR ACCOUNTS 921 - 935	LAB92135	7,223	3,097	350	3,166	463	53	74
6	LABOR EXCLUDING A&G	LABXAG	4,239,563	2,077,221	253,329	1,628,471	212,269	24,275	43,998
7	LABOR	LABOR	4,257,615	2,083,456	253,965	1,637,862	213,681	24,429	44,222
8	ACCOUNTS 581 - 589	OX58189	933,315	425,114	51,412	392,480	50,915	5,779	7,615
9	ACCOUNTS 591 - 598	MX59198	790,829	271,626	30,950	362,133	46,901	4,074	75,144
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19									
20									

REVENUES

1	REVENUE FROM SALES BY RATE CLAS	81,464,701	37,399,701	4,805,544	28,992,777	8,917,502	1,134,714	214,463
2								
3								
4								
5								

CLAIMED RATE OF RETURN

EQUALIZED RATE OF RETURN	9.89733%	9.897327%	9.8973%	9.8973%	9.8973%	9.8973%	9.8973%	9.8973%
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CURRENT REVENUE LEVELS

1	SALES REVENUE INCREASE	474,429	1,051,710	(766,825)	2,434,817	(2,290,127)	(180,935)	225,789
2	CURRENT SALES REVENUE	81,939,129	37,491,956	4,847,544	29,250,010	8,986,394	1,146,931	216,294
3	INCREASE IN OTHER SALES OF ELECTRICITY REV	1,471,459	677,702	70,381	521,390	171,739	27,342	2,904

BILLING DETERMINANTS

1	ANNUAL BOOKED KWH SALES	957,612,935	441,042,985	45,803,066	339,316,393	111,766,324	17,794,167	1,890,000
2	TOTAL ANNUAL CUSTOMERS (# of Bills)	683,016	598,442	47,173	36,622	96	454	229
3	ANNUAL BILLED KWH SALES	1,422,112	0	0	1,093,426	260,375	68,311	0
4								

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

ALLOCATION FACTOR RATIO TABLE - 23

CAPACITY-PRODUCTION RELATED

	ALLO	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
1 DEMAND PRODUCTION	DPROD	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000
2								
3								
4								
5								

CAPACITY-TRANSMISSION RELATED

1 DEMAND TRANSMISSION (WAPA)	DTRAN	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000
2								
3								
4								
5								

CAPACITY-SUBTRANSMISSION RELATED

1 DEMAND SUBTRANSMISSION	DTRANSUB	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000
2								
3								
4								
5								

CAPACITY-DISTRIBUTION RELATED

1 DIST - PRI DIST SUBSTATIONS	DDISPSUB	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
2 DIST - PRIMARY OVERHEAD LINES	DDISTPOL	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
3 DIST - PRIMARY UNDERGROUND LINES	DDISTPUL	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
4 DIST - SEC DIST SUBSTATIONS	DDISSSUB	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
5 DIST - SECONDARY OVERHEAD LINES	DDISTSOL	1.000000	0.378646	0.043041	0.510771	0.066153	0.000000	0.001389
6 DIST - SECONDARY UNDERGROUND LINES	DDISTSUL	1.000000	0.378646	0.043041	0.510771	0.066153	0.000000	0.001389
7 DIST - OVERHEAD LINE TRANSFORMERS	DDISTSOT	1.000000	0.378646	0.043041	0.510771	0.066153	0.000000	0.001389
8 DIST - UNDERGROUND LINE TRANSFORMERS	DDISTSOT	1.000000	0.378646	0.043041	0.510771	0.066153	0.000000	0.001389
9 DIST - OVERHEAD SERVICES	DDISTSOS	1.000000	0.801112	0.113041	0.083316	0.000402	0.001823	0.000306
10 DIST - UNDERGROUND SERVICES	DDISTSUS	1.000000	0.801112	0.113041	0.083316	0.000402	0.001823	0.000306
11 DIST - STREET LIGHTING	DDISTLTG	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	1.000000
12								
13								

CAPACITY-SYSTEM BENEFIT RELATED

1 DEMAND RENEWABLE	DRENEW	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000
2 DEMAND DSM	DDSM	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000
3 DEMAND ENVIRONMENTAL	DENVIRON	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000
4 DEMAND LOW INCOME	DLOWINC	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000
5								

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
ALLOCATION FACTOR RATIO TABLE - 24 ENERGY RELATED							
ENERGY PRODUCTION PWR SUPPLY	1.000000	0.460565	0.047830	0.354336	0.116713	0.018582	0.001974

ENERGY-SYSTEM BENEFIT RELATED

1	ENERGY RENEWABLE	ERENEW	1.000000	0.460565	0.047830	0.354336	0.16713	0.018582	0.001974
2	ENERGY DSM	EDSM	1.000000	0.460565	0.047830	0.354336	0.16713	0.018582	0.001974
3	ENERGY ENVIRONMENTAL	EENVIRON	1.000000	0.460565	0.047830	0.354336	0.16713	0.018582	0.001974
4	ENERGY LOW INCOME	ELOWINC	1.000000	0.460565	0.047830	0.354336	0.16713	0.018582	0.001974
5									

CUSTOMER RELATED-DISTRIBUTION

1	UNWEIGHTED CUSTOMER BILLS	CUSTAVG	1.000000	0.876176	0.069066	0.053618	0.000141	0.000665	0.000335
2	WEIGHTED CUSTOMER BILLS	CUST	1.000000	0.805687	0.107966	0.063818	0.000308	0.001834	0.000308
3	BILLING AND COLLECTION	BILLCOL	1.000000	0.805687	0.107966	0.063818	0.000388	0.001834	0.000308
4	CUSTOMER INFORMATION	CINFO	1.000000	0.805687	0.107966	0.063818	0.000388	0.001834	0.000308
5	METERS	CMEIERS	1.000000	0.795711	0.086229	0.062780	0.012765	0.001811	0.000304
6	STREET LIGHTING	CLIGHT	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	1.000000

CUSTOMER-SYSTEM BENEFIT RELATED

Customer	Renewable	DSM	Environmental
1	CRENEW	1.000000	0.805687
2	CDSM	1.000000	0.805687
3	CENVRON	1.000000	0.805687

19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 25

SUMMARY

ALLOCATION FACTOR RATIO TABLE - 25
INTERNALLY DEVELOPED

ALLOCATION FACTOR RATIO TABLE - 25		ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
INTERNALLY DEVELOPED									
1	PLANT IN SERVICE EXCL GENERAL	PISXGENL	1.000000	0.428838	0.048425	0.441086	0.064104	0.007343	0.010203
2	TOTAL PLANT IN SERVICE	TOTPIS	1.000000	0.428838	0.048425	0.441086	0.064104	0.007343	0.010203
3	PRODUCTION PLANT IN SERVICE	PRODPIS	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000
4	TRANSMISSION PLANT IN SERVICE	TRANPIS	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000
5	DISTRIBUTION PLANT IN SERVICE	DISTPIS	1.000000	0.412587	0.048782	0.460532	0.059155	0.005974	0.012969
6	OVERHEAD DISTRIBUTION PIS	CHDIST	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
7	UNDERGROUND DISTRIBUTION PIS	UGDIST	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
8	DISTRIBUTION SUBSTATIONS	DISTSUB	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
9	TOTAL TRANSMISSION & DISTRIBUTION	TDPLT	1.000000	0.424011	0.048425	0.446862	0.062634	0.007343	0.010203
10	GENERAL PLANT	GENLPIS	1.000000	0.428838	0.048425	0.441086	0.064104	0.007343	0.010203
11	BASE RATE SALES REVENUE	SALESREV	1.000000	0.459091	0.058989	0.355894	0.109465	0.013929	0.002633
12	TOTAL O&M LESS FUEL & PP	OM	1.000000	0.512320	0.062058	0.352331	0.052620	0.006512	0.014159
13	ACCOUNT 360	PLT360	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
14	ACCOUNT 361	PLT361	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
15	ACCOUNT 362	PLT362	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
16	ACCOUNT 364	PLT364	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
17	ACCOUNT 365	PLT365	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
18	ACCOUNT 366	PLT366	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
19	ACCOUNT 367	PLT367	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
20	ACCOUNT 368	PLT368	1.000000	0.378646	0.043041	0.510771	0.066153	0.008123	0.000306
21	ACCOUNT 369	PLT369	1.000000	0.801112	0.113041	0.083316	0.000402	0.001811	0.000304
22	ACCOUNT 370	PLT370	1.000000	0.795717	0.106629	0.082780	0.012765	0.001834	0.000308
23	ACCOUNT 371	PLT371	1.000000	0.805687	0.107966	0.083818	0.000388	0.001834	0.000308
24	ACCOUNT 373	PLT373	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	1.000000

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19-Dec-97 11:03

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

ALLOCATION FACTOR RATIO TABLE - 26 INTERIALLY DEVELOPED		TOTAL AED							STREET LIGHTING	
ALLOCC		(1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	(7)		
1 ACCOUNT 546	OX546	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
2 ACCOUNT 547	OX547	1.000000	0.480565	0.047830	0.354336	0.116713	0.018582	0.001974		
3 ACCOUNT 548	OX548	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000		
4 ACCOUNT 549	OX549	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
5 ACCOUNT 550	OX550	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000		
6 ACCOUNT 550.1	OX550.1	0.000000	0.000000	0.000000	0.369346	0.082360	0.012391	0.000000		
7 LABOR ACCOUNTS 547 - 550.1	LAB54750	1.000000	0.488794	0.047110	0.000000	0.000000	0.000000	0.000000		
8 ACCOUNT 551	MX551	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000		
9 ACCOUNT 552	MX552	0.000000	0.480565	0.047830	0.354336	0.116713	0.018582	0.001974		
10 ACCOUNT 553	MX553	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000		
11 ACCOUNT 554	MX554	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000		
12 ACCOUNT 554.1	MX554.1	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000		
13 LABOR ACCOUNTS 552 - 554.1	LAB55254	1.000000	0.478289	0.047378	0.363760	0.095144	0.012391	0.000000		
14 ACCOUNT 555	OX555	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
15 ACCOUNT 556	OX556	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
16 ACCOUNT 557	OX557	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
17 ACCOUNT 560	OX560	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
18 ACCOUNT 561	OX561	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
19 ACCOUNT 562	OX562	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
20 ACCOUNT 563	OX563	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
21 ACCOUNT 564	OX564	0.000000	0.000000	0.000000	0.369346	0.082360	0.012391	0.000000		
22 ACCOUNT 565	OX565	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
23 ACCOUNT 566	OX566	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
24 ACCOUNT 567	OX567	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000		
25 ACCOUNT 567.1	OX567.1	0.000000	0.000000	0.047110	0.369346	0.082360	0.012391	0.000000		
26 LABOR ACCOUNTS 561 - 567.1	LAB56167	1.000000	0.488794	0.000000	0.000000	0.000000	0.012391	0.000000		
27 ACCOUNT 568	MX568	0.000000	0.000000	0.047110	0.369346	0.082360	0.012391	0.000000		
28 ACCOUNT 569	MX569	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
29 ACCOUNT 570	MX570	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
30 ACCOUNT 571	MX571	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000		
31 ACCOUNT 572	MX572	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
32 ACCOUNT 573	MX573	1.000000	0.488794	0.047110	0.369346	0.082360	0.012391	0.000000		
33 LABOR ACCOUNTS 569 - 573	LAB56973	0.000000	0.536263	0.067348	0.339147	0.044466	0.005103	0.007674		
34 ACCOUNT 580	OX580	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000		
35 ACCOUNT 581	OX581	1.000000	0.375557	0.042660	0.506603	0.065613	0.008159	0.001378		
36 ACCOUNT 582	OX582	1.000000	0.375557	0.042660	0.506603	0.065613	0.008159	0.001378		
37 ACCOUNT 583	OX583	1.000000	0.375557	0.042660	0.506603	0.065613	0.008159	0.001378		
38 ACCOUNT 584	OX584	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	1.000000		
39 ACCOUNT 585	OX585	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000		
40 ACCOUNT 586	OX586	1.000000	0.795711	0.106629	0.082780	0.012765	0.001811	0.000304		

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

ALLOCATION FACTOR RATIO TABLE - 27
INTERNALLY DEVELOPED CONT

ALLOCATION FACTOR RATIO TABLE - 27								
INTERNALLY DEVELOPED CONT								
ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)	
1 ACCOUNT587	OX587	1.000000	0.412587	0.048782	0.460532	0.059155	0.005974	0.012969
2 ACCOUNT588	OX588	1.000000	0.412587	0.048782	0.460532	0.059155	0.005974	0.012969
3 ACCOUNT589	OX589	1.000000	0.412587	0.048782	0.460532	0.059155	0.005974	0.012969
4 LABOR ACCOUNTS 581 - 589	LAB581:89	1.000000	0.536263	0.067348	0.339147	0.044466	0.007674	0.007674
5 ACCOUNT 590	MX590	1.000000	0.388475	0.044898	0.478702	0.062093	0.007559	0.018274
6 ACCOUNT 591	MX591	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
7 ACCOUNT 592	MX592	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
8 ACCOUNT 593	MX593	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
9 ACCOUNT 594	MX594	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
10 ACCOUNT 595	MX595	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
11 ACCOUNT 596	MX596	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
12 ACCOUNT 597	MX597	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
13 ACCOUNT 598	MX598	1.000000	0.375557	0.042690	0.506603	0.065613	0.008159	0.001378
14 LABOR ACCOUNTS 591 - 598	LAB591:98	1.000000	0.412587	0.048782	0.460532	0.059155	0.005974	0.012969
15 ACCOUNT 901	OX901	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
16 ACCOUNT 902	OX902	1.000000	0.795711	0.106629	0.082780	0.012765	0.001811	0.000304
17 ACCOUNT 903	OX903	1.000000	0.805687	0.107966	0.083818	0.000388	0.001834	0.000308
18 ACCOUNT 904	OX904	1.000000	0.450911	0.058989	0.355894	0.109465	0.013929	0.002633
19 ACCOUNT 905	OX905	1.000000	0.805687	0.107966	0.083818	0.000388	0.001834	0.000308
20 LABOR ACCOUNTS 902 - 905	LAB902:05	1.000000	0.802995	0.107605	0.083537	0.003728	0.001828	0.000307
21 ACCOUNT 907	OX907	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
22 ACCOUNT 908	OX908	1.000000	0.805687	0.107966	0.083818	0.000388	0.001834	0.000308
23 ACCOUNT 909	OX909	1.000000	0.805687	0.107966	0.083818	0.000388	0.001834	0.000308
24 ACCOUNT 910	OX910	1.000000	0.805687	0.107966	0.083818	0.000388	0.001834	0.000308
25 LABOR ACCOUNT 908 - 910	LAB908:10	1.000000	0.805687	0.107966	0.083818	0.000388	0.001834	0.000308
26 ACCOUNT 911	OX911	1.000000	0.805687	0.107966	0.083818	0.000388	0.001834	0.000308
27 ACCOUNT 912	OX912	1.000000	0.805687	0.107966	0.083818	0.000388	0.001834	0.000308
28 ACCOUNT 913	OX913	1.000000	0.805687	0.107966	0.083818	0.000388	0.001834	0.000308
29 ACCOUNT 914	OX914	1.000000	0.805687	0.107966	0.083818	0.000388	0.001834	0.000308
30 LABOR ACCOUNT 912 - 917	LAB912:17	1.000000	0.805687	0.107966	0.083818	0.000388	0.001834	0.000308
31 ACCOUNT 920	OX920	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
32 ACCOUNT 921	OX921	1.000000	0.489961	0.056753	0.384113	0.050069	0.005726	0.010378
33 ACCOUNT 922	OX922	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
34 ACCOUNT 923	OX923	1.000000	0.489961	0.056753	0.384113	0.050069	0.005726	0.010378
35 ACCOUNT 924	OX924	1.000000	0.489961	0.056753	0.384113	0.050069	0.005726	0.010378
36 ACCOUNT 925	OX925	1.000000	0.489961	0.056753	0.384113	0.050069	0.005726	0.010378
37 ACCOUNT 926	OX926	1.000000	0.489961	0.056753	0.384113	0.050069	0.005726	0.010378
38 ACCOUNT 927	OX927	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
39 ACCOUNT 928	OX928	1.000000	0.428838	0.048425	0.441086	0.064104	0.007343	0.010203
40 ACCOUNT 929	OX929	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

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CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 1
PAGE 28

SUMMARY

ALLOCATION FACTOR RATIO TABLE - 28
INTERNALLY DEVELOPED CONT

ALLOC	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
1 ACCOUNT 930	1.000000	0.428838	0.048425	0.441086	0.064104	0.007343	0.010203
2 ACCOUNT 931	1.000000	0.428838	0.048425	0.441086	0.064104	0.007343	0.010203
3 ACCOUNT 933	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
4 ACCOUNT 935	1.000000	0.428838	0.048425	0.441086	0.064104	0.007343	0.010203
5 LABOR ACCOUNTS 921 - 935	1.000000	0.428838	0.048425	0.441086	0.064104	0.007343	0.010203
6 LABOR EXCLUDING A&G	1.000000	0.428838	0.048425	0.441086	0.064104	0.007343	0.010203
7 LABOR	1.000000	0.489348	0.059753	0.384113	0.050069	0.005726	0.010378
8 ACCOUNTS 581 - 589	1.000000	0.489348	0.059650	0.384690	0.050188	0.005738	0.010387
9 ACCOUNTS 591 - 598	1.000000	0.455488	0.055085	0.420522	0.054552	0.006192	0.008159
10	MX59198	0.343470	0.039136	0.457916	0.059307	0.005152	0.095020

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CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 2
PAGE 1

SUMMARY

	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
CURRENT RATE LEVELS RATE OF RETURN SUMMARY SCHEDULE - FUNCTION FORMAT							
RATE OF RETURN	9.90%	8.43%	20.99%	6.55%	34.80%	27.11%	-2.27%
REVENUES REQUIRED							
PRODUCTION							
1 DEMAND	31,202,913	15,267,036	1,463,341	11,545,739	2,542,923	363,875	0
2 ENERGY	18,241,772	8,437,869	861,984	6,507,664	2,065,393	332,176	36,667
3 TOTAL PRODUCTION	49,444,686	23,704,926	2,325,325	18,053,402	4,608,315	716,051	36,667
4 TRANSMISSION	2,393,058	1,004,357	184,457	655,336	489,195	59,713	0
5 SUBTRANSMISSION	4,217,915	1,764,960	327,409	1,147,770	871,569	106,208	0
6 DISTRIBUTION PRIMARY	16,634,208	5,823,170	1,063,651	7,100,773	2,370,717	246,242	9,655
7 DISTRIBUTION SECONDARY	0	0	0	0	0	0	0
8 DISTRIBUTION TRANSFORMERS & SERVICES	5,231,711	2,347,169	487,579	1,826,748	563,147	4,445	2,624
CUSTOMER							
9 METERING & METER INVESTMENT	1,733,110	1,313,156	247,629	128,226	38,976	4,797	326
10 BILLING & COLLECTION	1,027,713	829,626	108,984	86,564	383	1,833	323
11 INFORMATION	102,255	82,547	10,843	8,613	38	182	32
12 OTHER	600,331	350,197	45,990	36,542	162	773	166,667
SYSTEM BENEFITS							
13 RENEWABLES	122,555	60,123	5,679	45,567	9,707	1,479	0
14 ENVIRONMENTAL	0	0	0	0	0	0	0
15 DSM	362,956	178,058	16,818	134,951	28,749	4,380	0
16 LOW INCOME	68,631	33,669	3,180	25,518	5,436	828	0
17 TOTAL COMPANY	81,939,129	37,491,956	4,847,544	29,250,010	8,986,394	1,146,931	216,294

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
CURRENT RATE LEVELS RATE OF RETURN SUMMARY SCHEDULE - FUNCTION FORMAT	9.90%	8.43%	20.99%	6.55%	34.80%	27.11%	-2.27%
RATE OF RETURN							
CENTS/KWH							
1 PRODUCTION							
2 DEMAND	3.2584	3.4616	3.1949	3.4026	2.2752	2.1573	0.0000
3 ENERGY	1.9049	1.9132	1.8819	1.9179	1.8480	1.8668	1.9400
4 TOTAL PRODUCTION	5.1633	5.3747	5.0768	5.3205	4.1232	4.0241	1.9400
5 TRANSMISSION	0.2499	0.2277	0.4027	0.1931	0.4377	0.3356	0.0000
6 SUBTRANSMISSION	0.4405	0.4002	0.7148	0.3383	0.7798	0.5969	0.0000
7 DISTRIBUTION PRIMARY	1.7370	1.3203	2.3659	2.0927	2.1211	1.3838	0.5109
8 DISTRIBUTION SECONDARY	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
9 DISTRIBUTION TRANSFORMERS & SERVICES	0.5463	0.5322	1.0645	0.5384	0.5039	0.0250	0.1368
CUSTOMER							
10 METERING & METER INVESTMENT	0.1810	0.2977	0.5406	0.0378	0.0349	0.0270	0.0173
11 BILLING & COLLECTION	0.1073	0.1881	0.2379	0.0255	0.0003	0.0103	0.0171
12 INFORMATION	0.0107	0.0187	0.0237	0.0025	0.0000	0.0010	0.0017
13 OTHER	0.0627	0.0794	0.1004	0.0108	0.0001	0.0043	8.8184
SYSTEM BENEFITS							
14 RENEWABLES	0.0128	0.0136	0.0124	0.0134	0.0087	0.0083	0.0000
15 ENVIRONMENTAL	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
16 DSM	0.0379	0.0404	0.0367	0.0398	0.0257	0.0246	0.0000
17 LOW INCOME	0.0072	0.0076	0.0069	0.0075	0.0049	0.0047	0.0000
18 TOTAL COMPANY	8.5566	8.5007	10.5834	8.6203	8.0403	6.4455	11.4441

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 2
PAGE 3

SUMMARY

	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
CURRENT RATE LEVELS RATE OF RETURN SUMMARY SCHEDULE - FUNCTION FORMAT							
RATE OF RETURN	9.90%	8.43%	20.99%	6.55%	34.80%	27.11%	-2.27%
\$/KW							
1 PRODUCTION							
2 DEMAND	\$21.9412	\$0.0000	\$0.0000	\$10.5592	\$9.7664	\$5.6195	\$0.0000
3 ENERGY	\$12.8272	\$0.0000	\$0.0000	\$5.9516	\$7.9324	\$4.8627	\$0.0000
4 TOTAL PRODUCTION	\$34.7685	\$0.0000	\$0.0000	\$16.5109	\$17.6988	\$10.4822	\$0.0000
5 TRANSMISSION	\$1.6827	\$0.0000	\$0.0000	\$0.5993	\$1.8788	\$0.8741	\$0.0000
6 SUBTRANSMISSION	\$2.9660	\$0.0000	\$0.0000	\$1.0497	\$3.3474	\$1.5548	\$0.0000
7 DISTRIBUTION PRIMARY	\$11.6968	\$0.0000	\$0.0000	\$6.4941	\$9.1050	\$3.6047	\$0.0000
8 DISTRIBUTION SECONDARY	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000
9 DISTRIBUTION TRANSFORMERS & SERVICES	\$3.6788	\$0.0000	\$0.0000	\$1.6707	\$2.1628	\$0.0651	\$0.0000
CUSTOMER							
10 METERING & METER INVESTMENT	\$1.2187	\$0.0000	\$0.0000	\$0.1173	\$0.1497	\$0.0702	\$0.0000
11 BILLING & COLLECTION	\$0.7227	\$0.0000	\$0.0000	\$0.0792	\$0.0015	\$0.0268	\$0.0000
12 INFORMATION	\$0.0719	\$0.0000	\$0.0000	\$0.0079	\$0.0001	\$0.0027	\$0.0000
13 OTHER	\$0.4221	\$0.0000	\$0.0000	\$0.0334	\$0.0006	\$0.0113	\$0.0000
SYSTEM BENEFITS							
14 RENEWABLES	\$0.0862	\$0.0000	\$0.0000	\$0.0417	\$0.0373	\$0.0216	\$0.0000
15 ENVIRONMENTAL	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000
16 DSM	\$0.2552	\$0.0000	\$0.0000	\$0.1234	\$0.1104	\$0.0641	\$0.0000
17 LOW INCOME	\$0.0483	\$0.0000	\$0.0000	\$0.0233	\$0.0209	\$0.0121	\$0.0000
18 TOTAL COMPANY	\$57.6179	\$0.0000	\$0.0000	\$26.7508	\$34.5133	\$16.7898	\$0.0000

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
CURRENT RATE LEVELS RATE OF RETURN SUMMARY SCHEDULE - FUNCTION FORMAT							
RATE OF RETURN	9.90%	8.43%	20.99%	6.55%	34.80%	27.11%	-2.27%

\$/MONTH/CUSTOMER

1	PRODUCTION	\$45,6840	\$25,5113	\$31,0207	\$315,2678	\$26,488,7781	\$845,5387	\$0,0000
2	DEMAND	\$26,7077	\$14,0998	\$18,2728	\$177,6982	\$21,514,5063	\$731,6657	\$160,1166
3	ENERGY	\$72,3917	\$39,6111	\$49,2936	\$492,9660	\$48,003,2845	\$1,577,2044	\$160,1166
4	TOTAL PRODUCTION							
5	TRANSMISSION	\$3,5037	\$1,6783	\$3,9102	\$17,8946	\$5,095,7824	\$131,5258	\$0,0000
6	SUBTRANSMISSION	\$6,1754	\$2,9493	\$6,9406	\$31,3410	\$9,078,8396	\$233,9377	\$0,0000
7	DISTRIBUTION PRIMARY	\$24,3541	\$9,7305	\$22,9718	\$193,8936	\$24,694,9702	\$542,3837	\$42,1625
8	DISTRIBUTION SECONDARY	\$0,0000	\$0,0000	\$0,0000	\$0,0000	\$0,0000	\$0,0000	\$0,0000
9	DISTRIBUTION TRANSFORMERS & SERVICES	\$7,6597	\$3,9221	\$10,3360	\$49,8612	\$5,866,1118	\$9,7918	\$11,4565
10	CUSTOMER							
11	METERING & METER INVESTMENT	\$2,5374	\$2,1943	\$5,2494	\$3,5013	\$405,9989	\$10,5652	\$1,4255
12	BILLING & COLLECTION	\$1,5047	\$1,3863	\$2,3103	\$2,3637	\$3,9879	\$4,0372	\$1,4098
13	INFORMATION	\$0,1497	\$0,1379	\$0,2299	\$0,2352	\$0,3967	\$0,4017	\$0,1403
14	OTHER	\$0,8789	\$0,5852	\$0,9749	\$0,9978	\$1,6823	\$1,7034	\$727,8041
15	SYSTEM BENEFITS							
16	RENEWABLES	\$0,1794	\$0,1005	\$0,1204	\$1,2443	\$101,1190	\$3,2575	\$0,0000
17	ENVIRONMENTAL	\$0,0000	\$0,0000	\$0,0000	\$0,0000	\$0,0000	\$0,0000	\$0,0000
18	DSM	\$0,5314	\$0,2975	\$0,3665	\$3,6850	\$299,4709	\$9,6472	\$0,0000
19	LOW INCOME	\$0,1005	\$0,0563	\$0,0674	\$0,6968	\$56,6267	\$1,8242	\$0,0000
20	TOTAL COMPANY	\$119,9666	\$62,6493	\$102,7610	\$798,7005	\$93,608,2708	\$2,526,2797	\$944,5153

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
CURRENT RATE LEVELS AT EQUALIZED RATE OF RETURN SUMMARY SCHEDULE - FUNCTION FORMAT							
RATE OF RETURN	9.90%	9.90%	9.90%	9.90%	9.90%	9.90%	9.90%
REVENUES REQUIRED							
PRODUCTION							
1 DEMAND	31,214,048	15,257,084	1,470,547	11,528,566	2,571,041	386,809	(0)
2 ENERGY	18,286,004	8,421,545	874,735	6,478,950	2,134,844	339,847	36,084
3 TOTAL PRODUCTION	49,500,052	23,678,629	2,345,282	18,007,516	4,705,885	726,656	36,084
4 TRANSMISSION	2,272,325	1,112,273	106,326	841,539	184,298	27,890	(0)
5 SUBTRANSMISSION	4,001,260	1,958,617	187,201	1,481,913	324,427	49,101	(0)
6 DISTRIBUTION PRIMARY	16,667,082	6,263,391	707,752	8,456,757	1,081,092	134,996	23,093
7 DISTRIBUTION SECONDARY	(0)	(0)	(0)	(0)	(0)	(0)	(0)
8 DISTRIBUTION TRANSFORMERS & SERVICES	5,277,089	2,531,283	313,458	2,160,631	263,443	2,274	6,000
CUSTOMER							
9 METERING & METER INVESTMENT	1,729,217	1,376,607	183,757	143,299	21,909	3,117	528
10 BILLING & COLLECTION	1,027,326	827,667	110,936	86,104	398	1,884	317
11 INFORMATION	102,217	82,353	11,038	8,567	40	187	32
12 OTHER	807,700	349,367	46,826	36,344	168	795	374,199
SYSTEM BENEFITS							
13 RENEWABLES	122,715	59,980	5,782	45,321	10,111	1,521	(0)
14 ENVIRONMENTAL	(0)	(0)	(0)	(0)	(0)	(0)	(0)
15 DSM	363,428	177,635	17,124	134,222	29,943	4,504	(0)
16 LOW INCOME	68,720	33,589	3,238	25,380	5,662	852	(0)
17 TOTAL COMPANY	81,939,130	38,451,411	4,038,719	31,427,594	6,627,375	953,779	440,252

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 2
PAGE 6

SUMMARY

	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
CURRENT RATE LEVELS AT EQUALIZED RATE OF RETURN SUMMARY SCHEDULE - FUNCTION FORMAT							
RATE OF RETURN	9.90%	9.90%	9.90%	9.90%	9.90%	9.90%	9.90%
CENTS/KWH							
PRODUCTION							
1 DEMAND	3.2596	3.4593	3.2106	3.3976	2.3004	2.1738	0.0000
2 ENERGY	1.9095	1.9095	1.9098	1.9094	1.9101	1.9099	1.9092
3 TOTAL PRODUCTION	5.1691	5.3688	5.1204	5.3070	4.2105	4.0837	1.9092
4 TRANSMISSION	0.2373	0.2522	0.2321	0.2480	0.1649	0.1567	0.0000
5 SUBTRANSMISSION	0.4178	0.4441	0.4087	0.4367	0.2903	0.2759	0.0000
6 DISTRIBUTION PRIMARY	1.7405	1.4201	1.5452	2.4923	0.9673	0.7587	1.2218
7 DISTRIBUTION SECONDARY	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
8 DISTRIBUTION TRANSFORMERS & SERVICES	0.5511	0.5739	0.6844	0.6368	0.2357	0.0128	0.3175
CUSTOMER							
9 METERING & METER INVESTMENT	0.1806	0.3121	0.4012	0.0422	0.0196	0.0175	0.0280
10 BILLING & COLLECTION	0.1073	0.1877	0.2422	0.0254	0.0004	0.0106	0.0168
11 INFORMATION	0.0107	0.0187	0.0241	0.0025	0.0000	0.0011	0.0017
12 OTHER	0.0843	0.0792	0.1022	0.0107	0.0002	0.0045	19.7989
SYSTEM BENEFITS							
13 RENEWABLES	0.0128	0.0136	0.0126	0.0134	0.0090	0.0085	0.0000
14 ENVIRONMENTAL	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
15 DSM	0.0380	0.0403	0.0374	0.0396	0.0268	0.0253	0.0000
16 LOW INCOME	0.0072	0.0076	0.0071	0.0075	0.0051	0.0048	0.0000
17 TOTAL COMPANY	8.5566	8.7183	8.8176	9.2620	5.9297	5.3601	23.2938

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SCHEDULE 2
PAGE 7

SUMMARY

	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
CURRENT RATE LEVELS AT EQUALIZED RATE OF RETURN SUMMARY SCHEDULE - FUNCTION FORMAT							
RATE OF RETURN	9.90%	9.90%	9.90%	9.90%	9.90%	9.90%	9.90%
\$/KW							
PRODUCTION							
1 DEMAND	\$21,9491	\$0.0000	\$0.0000	\$10,5435	\$9,8744	\$5,6625	\$0.0000
2 ENERGY	\$12,8583	\$0.0000	\$0.0000	\$5,9254	\$8,1991	\$4,9750	\$0.0000
3 TOTAL PRODUCTION	\$34,8074	\$0.0000	\$0.0000	\$16,4689	\$18,0735	\$10,6375	\$0.0000
4 TRANSMISSION	\$1,5979	\$0.0000	\$0.0000	\$0,7696	\$0,7078	\$0,4083	\$0.0000
5 SUBTRANSMISSION	\$2,8136	\$0.0000	\$0.0000	\$1,3553	\$1,2460	\$0,7188	\$0.0000
6 DISTRIBUTION PRIMARY	\$11,7200	\$0.0000	\$0.0000	\$7,7342	\$4,1521	\$1,9762	\$0.0000
7 DISTRIBUTION SECONDARY	(\$0.0000)	\$0.0000	\$0.0000	(\$0.0000)	(\$0.0000)	(\$0.0000)	\$0.0000
8 DISTRIBUTION TRANSFORMERS & SERVICES	\$3,7107	\$0.0000	\$0.0000	\$1,9760	\$1,0118	\$0,0333	\$0.0000
CUSTOMER							
9 METERING & METER INVESTMENT	\$1,2159	\$0.0000	\$0.0000	\$0,1311	\$0,0841	\$0,0456	\$0.0000
10 BILLING & COLLECTION	\$0,7224	\$0.0000	\$0.0000	\$0,0787	\$0,0015	\$0,0276	\$0.0000
11 INFORMATION	\$0,0719	\$0.0000	\$0.0000	\$0,0078	\$0,0002	\$0,0027	\$0.0000
12 OTHER	\$0,5680	\$0.0000	\$0.0000	\$0,0332	\$0,0006	\$0,0116	\$0.0000
SYSTEM BENEFITS							
13 RENEWABLES	\$0,0863	\$0.0000	\$0.0000	\$0,0414	\$0,0388	\$0,0223	\$0.0000
14 ENVIRONMENTAL	(\$0.0000)	\$0.0000	\$0.0000	(\$0.0000)	(\$0.0000)	(\$0.0000)	\$0.0000
15 DSM	\$0,2556	\$0.0000	\$0.0000	\$0,1228	\$0,1150	\$0,0659	\$0.0000
16 LOW INCOME	\$0,0483	\$0.0000	\$0.0000	\$0,0232	\$0,0217	\$0,0125	\$0.0000
17 TOTAL COMPANY	\$57,6179	\$0.0000	\$0.0000	\$28,7423	\$25,4532	\$13,9623	\$0.0000

CITIZENS UTILITIES COMPANY - AED
ELECTRIC COST OF SERVICE STUDY
12 MONTHS ENDED MARCH 31, 1995

SUMMARY

	TOTAL AED (1)	RESIDENTIAL (2)	SGS (3)	LGS (4)	LPS (5)	INTERRUPTIBLE (6)	STREET LIGHTING (7)
CURRENT RATE LEVELS AT EQUALIZED RATE OF RETURN SUMMARY SCHEDULE - FUNCTION FORMAT							
RATE OF RETURN	9.90%	9.90%	9.90%	9.90%	9.90%	9.90%	9.90%
\$/MONTH/CUSTOMER							
PRODUCTION							
1 DEMAND	\$45,7003	\$25,4947	\$31,1735	\$314,7989	\$26,781,6781	\$852,0030	(\$0,0000)
2 ENERGY	\$26,7724	\$14,0724	\$18,5431	\$176,9141	\$22,237,9590	\$748,5613	\$157,5723
3 TOTAL PRODUCTION	\$72,4728	\$39,5671	\$49,7166	\$491,7131	\$49,019,6371	\$1,600,5643	\$157,5723
4 TRANSMISSION	\$3,3269	\$1,8586	\$2,2540	\$22,9791	\$1,919,7659	\$61,4314	(\$0,0000)
5 SUBTRANSMISSION	\$5,8582	\$3,2729	\$3,9684	\$40,4651	\$3,379,4515	\$108,1526	(\$0,0000)
6 DISTRIBUTION PRIMARY	\$24,4022	\$10,4662	\$15,0033	\$230,9201	\$11,261,3746	\$297,3487	\$100,8408
7 DISTRIBUTION SECONDARY	(\$0,0000)	(\$0,0000)	(\$0,0000)	(\$0,0000)	(\$0,0000)	(\$0,0000)	(\$0,0000)
8 DISTRIBUTION TRANSFORMERS & SERVICES	\$7,7262	\$4,2298	\$6,6449	\$58,9982	\$2,744,1927	\$5,0092	\$26,2018
CUSTOMER							
9 METERING & METER INVESTMENT	\$2,5317	\$2,3003	\$3,8954	\$3,9129	\$228,2149	\$6,8652	\$2,3075
10 BILLING & COLLECTION	\$1,5041	\$1,3831	\$2,3517	\$2,3511	\$4,1509	\$4,1503	\$1,3828
11 INFORMATION	\$0,1497	\$0,1376	\$0,2340	\$0,2339	\$0,4130	\$0,4129	\$0,1376
12 OTHER	\$1,1825	\$0,5838	\$0,9926	\$0,9924	\$1,7521	\$1,7518	\$1,634,0562
SYSTEM BENEFITS							
13 RENEWABLES	\$0,1797	\$0,1002	\$0,1226	\$1,2375	\$105,3179	\$3,3501	(\$0,0000)
14 ENVIRONMENTAL	(\$0,0000)	(\$0,0000)	(\$0,0000)	(\$0,0000)	(\$0,0000)	(\$0,0000)	(\$0,0000)
15 DSM	\$0,5321	\$0,2968	\$0,3630	\$3,6631	\$311,9061	\$9,9216	(\$0,0000)
16 LOW INCOME	\$0,1006	\$0,0561	\$0,0686	\$0,6930	\$58,9780	\$1,8761	(\$0,0000)
17 TOTAL COMPANY	\$119,9666	\$64,2525	\$85,6151	\$868,1616	\$69,035,1548	\$2,100,8343	\$1,922,4990

Citizens Utilities Inc.
Arizona Electric Division

Page 1 of 2

Reconciliation of Various Revenue Statistics

Line No.	Description	Data Used in Cost Study	Basis of Current rates
1 +	Total Operating Revenues per Company as filed	\$78,991,247	
2 -	Less Other Revenue	<u>728,014</u>	
3 =	Sales revenues at Previous Rates per filed billing determina	78,263,233	
4			
5 +	PPFA Refunds	<u>1,471,459</u>	
6 =	As filed Base Rate Revenues	79,734,692	79,734,692
7			
8 +	ACC accepted end of year sales growth annualization	<u>1,730,008</u>	1,730,008
9 =	Total Base Rate Revenue per ACC	81,464,700	
10			
11 -	PPFA Refunds	<u>1,471,459</u>	
12 =	Total sales revenue per ACC	79,993,241	
13			
14 +	Other revenues	<u>728,014</u>	
15 =	Total Present Revenues per ACC	80,721,255	
16			
17 +	ACC Allowed Increase	<u>474,428</u>	<u>474,428</u>
18 =	Total Allowed Revenues	\$81,195,683	
19			
20	Total Present Revenues		<u>\$81,939,128</u>

NOTES:

BOLD indicates data shown in ACC Order 59951.

Italic indicates data shown in Files and Unbundled cost studies.

Citizens Utilities, Inc.
Arizona Electric Division

Page 2 of 2

Revenue Proof

<u>Class of Service</u>	<u>Revenue at Approved Rates</u>	<u>Revenue at Step 4 Rates</u>	<u>Increase</u>	<u>Percent Increase</u>
1 <u>Residential</u>				
2 Mohave	31,853,291	32,387,314	534,023	1.68%
3 Santa Cruz	6,066,548	6,358,271	291,723	4.81%
4 Total Residential	37,919,839	38,745,585	825,746	2.18%
5				
6 <u>General Service</u>				
7 SGSM	2,213,739	2,433,010	219,271	9.91%
8 SGSSC	2,656,326	1,637,716	(1,018,610)	-38.35%
9 Total SGS	4,870,065	4,070,726	(799,339)	-16.41%
10				
11 IPS	1,152,259	959,986	(192,273)	-16.69%
12 LGS	29,385,900	31,678,558	2,292,658	7.80%
13 Total Commercial	35,408,224	36,709,271	1,301,046	3.67%
14				
15 <u>Industrial</u>				
16 LPS 69kV	893,590	677,577	(216,013)	-24.17%
17 LPS <69kV	8,134,553	5,995,615	(2,138,938)	-26.29%
18 Total Industrial	9,028,143	6,673,192	(2,354,951)	-26.08%
19				
20 St Lghtg	217,299	445,459	228,159	105.00%
21				
22 Total Arizona	82,573,506	82,573,506	1	0.00%
23				
24				
25 less CARES Discount	253,702	253,702	0	0.00%
26				
27 Subtotal	82,319,803	82,319,804	1	0.00%
28				
29 X Booked to Billed Ratio	99.54%	99.54%		
30				
31 Booked Revenue	\$81,939,129	\$81,939,130	1	0.00%

ona Electric Division

Standard Offer Revenue Comparisons

Class of Service

	<u>Revenue at</u>	<u>Revenue at</u>		<u>Percent</u>
<u>Residential</u>	<u>Approved Rates</u>	<u>Proposed Rates</u>	<u>Increase</u>	<u>Increase</u>
Mohave	31,493,862	32,144,080	650,218	2.06%
Santa Cruz	5,998,094	6,307,331	309,237	5.16%
Total Residential	37,491,956	38,451,411	959,455	2.56%
<u>General Service</u>				
SGSM	2,203,502	2,412,923	209,420	9.50%
SGSSC	2,644,042	1,625,796	(1,018,246)	-38.51%
Total SGS	4,847,544	4,038,719	(808,825)	-16.69%
IPS	1,146,931	953,779	(193,152)	-16.84%
LGS	29,250,010	31,427,594	2,177,584	7.44%
Total Commercial	35,244,485	36,420,092	1,175,607	3.34%
<u>Industrial</u>				
LPS 69kV	889,458	673,908	(215,550)	-24.23%
LPS <69kV	8,096,936	5,953,467	(2,143,470)	-26.47%
Total Industrial	8,986,394	6,627,375	(2,359,019)	-26.25%
St Lghtg	216,294	440,252	223,958	103.54%
Total Arizona	81,939,129	81,939,130	1	0.00%

Citizens Utilities Company
Arizona Electric Division

Page 2 of 5

Typical Bill Analysis - Impact of Step 1

Line No.	Rate Schedule	Description	kW Demand	kWh Consumption	Present Bill	Proposed Bill	Percent Increase
1							
2	RSSC	Residential--		250	26.73	28.76	7.6%
3		Santa Cruz County		500	46.95	46.51	-0.9%
4				1000	87.40	82.01	-6.2%
5				1500	127.85	117.51	-8.1%
6							
7	RSMo	Residential--		250	25.63	29.59	15.5%
8		Mohave County		500	44.75	48.16	7.6%
9				1000	83.00	85.31	2.8%
10				1500	121.25	122.46	1.0%
11							
12	SGSSC	Small General Service		500	70.00	67.95	-2.9%
13		Santa Cruz County		1000	130.00	119.45	-8.1%
14				1500	190.00	170.95	-10.0%
15				2000	250.00	222.45	-11.0%
16				2500	310.00	273.95	-11.6%
17							
18	SGSMo	Small General Service		500	48.00	51.45	7.2%
19		Mohave County		1000	86.00	86.45	0.5%
20				1500	124.00	121.45	-2.1%
21				2000	162.00	156.45	-3.4%
22				2500	200.00	191.45	-4.3%
23							
24							
25							
26							
27							
28							
29							
30	LGS	Large General	20	5,840	520.72	534.09	2.6%
31		Service	50	14,600	1,286.64	1,321.03	2.7%
32		(at 40% Load Factor)	100	29,200	2,563.18	2,632.59	2.7%
33			250	73,000	6,392.80	6,567.27	2.7%
34							
35							
36	LPS	Large Power	500	146,000	12,500.00	11,698.44	-6.4%
37		Service 69kV	1,000	292,000	24,200.00	22,683.64	-6.3%
38		(at 40% Load Factor)	2,500	730,000	59,300.00	55,639.24	-6.2%
39			5,000	1,460,000	117,800.00	110,565.24	-6.1%
40							
41							
42	LPS	Large Power	500	146,000	16,390.00	15,290.62	-6.7%
43		Service <69kV	1,000	292,000	32,415.00	30,255.82	-6.7%
44		(at 40% Load Factor)	2,500	730,000	80,490.00	75,151.42	-6.6%
45			5,000	1,460,000	160,615.00	149,977.42	-6.6%
46							
47							
48	IPS	Interruptible Power	20	5,840	380.72	361.93	-4.9%
49		Service	50	14,600	936.64	888.47	-5.1%
50		(at 40% Load Factor)	100	29,200	1,863.18	1,766.03	-5.2%
51			250	73,000	4,642.80	4,398.71	-5.3%
52							
53							
54							
55	St Lght	100 Watt Lamp					
56		Existing Pole		Overhead	Underground	Overhead	Underground
57		New Wood		5.30	7.32	5.99	8.26
58		New F'glass or Metal		9.33	11.34	10.54	12.81
				13.35	15.36	15.08	17.36

Citizens Utilities Company
Arizona Electric Division

Page 3 of 5

Comparison of Present and Proposed Standard Offer Tariffs - Step 4

	<u>Rate Schedule</u>	<u>Description</u>	<u>Block</u>	<u>Present Rate</u>	<u>Equalized Rate</u>	<u>Absolute Change</u>	<u>Percent Change</u>
1	RSSC	Residential—	Customer Charge	\$6.50 per Customer per Month	\$24.53	\$18.03	277.5%
2		Santa Cruz County	All kilowatthours	\$0.0809 per kWh	\$0.05456	-\$0.02634	-32.6%
3							
4	RSMo	Residential—	Customer Charge	\$6.50 per Customer per Month	\$24.53	\$18.03	277.5%
5		Mohave County	All kilowatthours	\$0.0765 per kWh	\$0.05456	-\$0.02194	-28.7%
6							
7	SGSSC	Small General Service	Customer Charge	\$10.00 per Customer per Month	\$35.78	\$25.78	257.8%
8		Santa Cruz County	All kilowatthours	\$0.1200 per kWh	\$0.05202	-\$0.06798	-56.7%
9							
10	SGSMo	Small General Service	Customer Charge	\$10.00 per Customer per Month	\$35.78	\$25.78	257.8%
11		Mohave County	All kilowatthours	\$0.0760 per kWh	\$0.05202	-\$0.02398	-31.6%
12							
13	SCTOD	Small Commercial	Customer Charge	Incorporated			
14		Time of Day Service	Demand Charge	Within LGS			
15			Energy Charge	Tariff.			
16							
17	LGS	Large General	Customer Charge	\$10.10 per Customer per Month	\$7.58	-\$2.52	-24.9%
18		Service	Demand Charge	\$9.50 per kW per Month	\$22.58	\$13.08	137.6%
19			Energy Charge	\$0.0549 per kWh	\$0.01979	-\$0.03511	-63.9%
20							
21	LPS	Large Power	Customer Charge	\$800.00 per Customer per Month	\$452.97	-\$347.03	-43.4%
22		Service 69kV	Demand Charge	\$16.10 per kW per Month	\$11.90	-\$4.20	-26.1%
23			Energy Charge	\$0.0250 per kWh	\$0.01960	-\$0.00540	-21.6%
24							
25	LPS	Large Power	Customer Charge	\$365.00 per Customer per Month	\$206.67	-\$158.33	-43.4%
26		Service <69kV	Demand Charge	\$24.75 per kW per Month	\$17.78	-\$6.97	-28.2%
27			Energy Charge	\$0.0250 per kWh	\$0.01960	-\$0.00540	-21.6%
28							
29	IPS	Interruptible Power	Customer Charge	\$10.10 per Customer per Month	\$13.35	\$3.25	32.2%
30		Service	Demand Charge	\$2.50 per kW per Month	\$8.86	\$6.36	254.6%
31			Energy Charge	\$0.0549 per kWh	\$0.01958	-\$0.03532	-64.3%
32							
33							
34							
35	LTG	Street Lighting	Energy Charge	\$0.05304 per Watt	\$0.108731	0.06	105.0%
36		Overhead	Existing Pole	\$0.00 per light, per month	\$0.00	0.00	
37			New Wood	\$4.02 per light, per month	\$8.25	4.23	105.0%
38			New F'glass or Met	\$8.05 per light, per month	\$16.50	8.45	105.0%
39		Underground	Existing Pole	\$2.01 per light, per month	\$4.12	2.11	104.8%
40			New Wood	\$6.04 per light, per month	\$12.37	6.33	105.0%
41			New F'glass or Met	\$10.06 per light, per month	\$20.62	10.56	105.0%

Citizens Utilities Company
Arizona Electric Division

Page 4 of 5

Large Customer Bill Analysis

Line No.	Rate Schedule	Customer	Billing data			Present Bill	Billed on LGS		Billed on LPS	
			kW Demand	kWh Consumption	Load Factor		Proposed Bill	Percent Increase	Proposed Bill	Percent Increase
1	LGS									
2	Special	Line 2	4846	2,199,000		166,772.20	152,934.59	-8.3%	129,482.54	-22.4%
3		Line 3	8,719	4,946,550	77.7%	354,406.20	294,754.09	-16.8%	252,211.10	-28.8%
4		Line 4	4,825	4,947,400		317,459.86	206,863.14	-34.8%	182,988.29	-42.4%
5		Line 5	6,338	3,534,640	76.4%	254,272.84	213,054.81	-16.2%	182,195.54	-28.3%
6		Line 6	5,814	3,400,800	80.1%	241,947.02	198,576.15	-17.9%	170,254.49	-29.6%
7		Line 7	7,265	2,096,320	39.5%	184,115.57	205,511.49	11.6%	170,482.02	-7.4%
8		Line 8	8,516	3,711,600	59.7%	284,678.94	265,726.37	-6.7%	224,391.80	-21.2%
9		Line 9	4,879	2,695,440	75.7%	194,340.26	163,506.25	-15.9%	139,801.43	-28.1%
10		Line 10	8,350	3,415,200	56.0%	266,829.58	256,111.86	-4.0%	215,629.57	-19.2%
11		Line 11	8,512	4,575,200	73.6%	332,052.58	282,730.42	-14.9%	241,250.54	-27.3%
12		Line 12	5,494	2,398,320	59.8%	183,870.87	171,508.71	-6.7%	144,912.10	-21.2%
13		Line 13	6,653	1,893,900	39.0%	167,188.71	187,688.71	12.3%	155,631.80	-6.9%
14		Line 14	5,595	2,361,600	57.8%	182,814.44	173,061.95	-5.3%	145,988.14	-20.1%
15		Line 15	5,184	2,320,800	61.3%	176,670.02	162,975.95	-7.8%	137,880.28	-22.0%
16		Line 16	4,892	2,253,800	63.1%	170,217.72	155,057.77	-8.9%	131,374.75	-22.8%
17		Line 17	9,433	5,470,000	79.4%	389,926.60	321,234.10	-17.6%	275,168.41	-29.4%
18		Line 18	5,826	1,835,400	43.2%	156,120.56	167,861.07	7.5%	139,780.03	-10.5%
19		Line 19	6,472	1,844,320	39.0%	162,747.27	182,621.20	12.2%	151,441.47	-6.9%
20		Line 20	2,920	962,000	45.1%	80,563.90	84,969.24	5.5%	70,986.27	-11.9%
21		Line 21	<u>3,789</u>	<u>1,640,400</u>	<u>59.3%</u>	<u>126,063.56</u>	<u>118,015.52</u>	<u>-6.4%</u>	<u>99,737.25</u>	<u>-20.9%</u>
22		Total	124322	58,502,690	64.5%	4,393,058.68	3,964,763.39	-9.7%	3,361,587.82	-23.5%
23										
24										
25	LPS									
26		Line 26	47,434	28,901,739	83.5%	1,896,899.98	1,410,218.50	-25.7%		
27		Line 27	45,314	20,798,000	62.9%	1,641,836.50	1,213,658.35	-26.1%		
28		Line 28	42,981	18,765,200	59.8%	1,533,274.75	1,132,324.46	-26.1%		
29		Line 29	39,322	14,773,162	51.5%	1,342,913.55	989,004.32	-26.4%		
30	69kV	Line 30	34,499	20,482,000	81.3%	1,068,283.90	812,462.31	-23.9%		
31	69kV	Line 31	30,994	16,362,612	72.3%	908,868.70	690,002.57	-24.1%		
32	69kV	Line 32	6,469	1,920,800	40.7%	152,970.90	115,078.91	-24.8%		
33	Special	Line 33	15,900	10,567,088	91.0%	658,067.20	490,081.00	-25.5%		
34	Special	Line 34	14,639	7,144,897	66.9%	541,302.68	400,571.04	-26.0%		
35	Special	Line 35	12,239	3,814,000	42.7%	398,630.25	292,598.15	-26.6%		
36	Special	Line 36	<u>11,955</u>	<u>3,958,200</u>	<u>45.4%</u>	<u>395,206.25</u>	<u>290,375.20</u>	<u>-26.5%</u>		
37		Total	301,746	147,487,698	67.0%	10,538,254.65	7,836,374.82	-25.6%		

Citizens Utilities Company
Arizona Electric Division

Page 5 of 5

Typical Bill Analysis Over 4 Years

Line No.	Rate Schedule	Description	kW Demand	kWh Consumption	Present Bill	Proposed Bill	Percent Increase
1							
2	RSSC	Residential--		250	26.73	38.17	42.8%
3		Santa Cruz County		500	46.95	51.81	10.4%
4				1000	87.40	79.09	-9.5%
5				1500	127.85	106.37	-16.8%
6							
7	RSMo	Residential--		250	25.63	38.17	49.0%
8		Mohave County		500	44.75	51.81	15.8%
9				1000	83.00	79.09	-4.7%
10				1500	121.25	106.37	-12.3%
11							
12	SGSSC	Small General Service		500	70.00	61.79	-11.7%
13		Santa Cruz County		1000	130.00	87.80	-32.5%
14				1500	190.00	113.81	-40.1%
15				2000	250.00	139.82	-44.1%
16				2500	310.00	165.83	-46.5%
17							
18	SGSMo	Small General Service		500	48.00	61.79	28.7%
19		Mohave County		1000	86.00	87.80	2.1%
20				1500	124.00	113.81	-8.2%
21				2000	162.00	139.82	-13.7%
22				2500	200.00	165.83	-17.1%
23							
24		<u>Billing Demand</u>					
24	LGSTOD	Small Commercial	5	1095	122.72	147.13	19.9%
25		Time of Day Service	10	2190	230.33	281.69	22.3%
26		(at 30% Load Factor)	15	3285	337.95	416.24	23.2%
27			20	4380	445.56	550.79	23.6%
28							
29							
30	LGS	Large General	20	5,840	520.72	574.69	10.4%
31		Service	50	14,600	1,286.64	1,425.34	10.8%
32		(at 40% Load Factor)	100	29,200	2,563.18	2,843.10	10.9%
33			250	73,000	6,392.80	7,096.36	11.0%
34							
35							
36	LPS	Large Power	500	146,000	12,500.00	9,264.34	-25.9%
37		Service 69kV	1,000	292,000	24,200.00	18,075.71	-25.3%
38		(at 40% Load Factor)	2,500	730,000	59,300.00	44,509.83	-24.9%
39			5,000	1,460,000	117,800.00	88,566.68	-24.8%
40							
41							
42	LPS	Large Power	500	146,000	16,390.00	11,959.36	-27.0%
43		Service <69kV	1,000	292,000	32,415.00	23,712.05	-26.8%
44		(at 40% Load Factor)	2,500	730,000	80,490.00	58,970.13	-26.7%
45			5,000	1,460,000	160,615.00	117,733.59	-26.7%
46							
47							
48	IPS	Interruptible Power	20	5,840	380.72	304.98	-19.9%
49		Service	50	14,600	936.64	742.43	-20.7%
50		(at 40% Load Factor)	100	29,200	1,863.18	1,471.50	-21.0%
51			250	73,000	4,642.80	3,658.72	-21.2%
52							
53							
54							
55	St Lght	<u>100 Watt Lamp</u>					
56		Existing Pole		Overhead	Underground	Overhead	Underground
56				5.30	7.32	10.87	14.99
57		New Wood		9.33	11.34	19.12	23.24
58		New F'glass or Metal		13.35	15.36	27.37	31.49

Citizens Utilities, Inc.
Arizona Electric Division

Development of Present Billed Revenue and Development of Booked to Billed Adjustment Factor													
	RESMO	RESSC	TotRes	SGSMO	SGSSC	Tot SGS	LGS	IPS	69kV LPS	<69kV LPS	Tot LPS	LTG	TOTAL
1 NO. OF BILLS	485,943	112,499	598,442	31,713	15,460	47,173	36,622	454	12	84	96	1	682,788
2 DEMAND	0	0	0	0	0	0	1,093,428	68,311	28,966	231,409	260,375	0	1,422,112
3 ENERGY	375,093,610	65,949,375	441,042,985	24,955,351	20,847,715	45,803,066	339,316,393	17,794,167	16,705,500	95,060,824	111,766,324	1,890,000	957,612,936
4													
5 Current Rates						Approx Load Factor	42.51%	35.68%		56.27%	58.80%		
6 System Benefits													
7 Metering													
8 Billing													
9 Info systems													
10 Other													
11 Production Demand													
12 Production Energy	\$0.07650	\$0.08090		\$0.07600	\$0.12000		\$0.05490	\$0.05490	\$0.02500	\$0.02500			
13 T&D Demand													
14 Total Customer Chg	\$6.50	\$6.50		\$10.00	\$10.00	\$0.09603	\$10.10	\$10.10	\$800.00	\$365.00	\$419.38	217,299	
15 Total Energy Chg	\$0.07650	\$0.08090	\$0.07716	\$0.07600	\$0.12000	\$0.09603	\$0.05490	\$0.05490	\$0.02500	\$0.02500	\$0.02500	\$0.00000	
16 Total Demand Chg							\$9.50	\$2.50	\$16.10	\$24.75	\$23.79		
17 Billed Customer	3,158,630	731,244	3,889,873	317,133	154,600	471,733	369,883	4,582	9,600	30,660	40,260	217,299	4,993,630
18 Billed Energy	28,694,661	5,335,304	34,029,966	1,896,607	2,501,726	4,398,333	18,628,470	976,900	417,638	2,376,521	2,794,158	0	60,827,826
19 Billed Demand	0	0	0	0	0	0	10,387,547	170,778	466,353	5,727,373	6,193,725	0	16,752,050
20 Total Billed	31,853,291	6,066,548	37,919,839	2,213,739	2,656,326	4,870,065	29,385,900	1,152,259	893,590	8,134,553	9,028,143	217,299	82,573,506
21													
22 less CARES Disc	213,114	40,588	253,702										
23 CARES Cust	213,114	40,588	253,702										
24 CARES Energy	0	0	0										
25 CARES Demand	0	0	0										
26													
27 Billings Net of CARES													
28 Billed Customer	2,945,515	690,655	3,636,171	317,133	154,600	471,733	369,883	4,582	9,600	30,660	40,260	217,299	4,993,630
29 Billed Energy	28,694,661	5,335,304	34,029,966	1,896,607	2,501,726	4,398,333	18,628,470	976,900	417,638	2,376,521	2,794,158	0	60,827,826
30 Billed Demand	0	0	0	0	0	0	10,387,547	170,778	466,353	5,727,373	6,193,725	0	16,752,050
31 TOTAL BILLED	31,640,177	6,025,960	37,666,136	2,213,739	2,656,326	4,870,065	29,385,900	1,152,259	893,590	8,134,553	9,028,143	217,299	82,319,803
32													
33 B to B Multiplier	0.9954	0.9954		0.9954	0.9954		0.9954	0.9954	0.9954	0.9954		0.9954	0.9954
34 Expected revenue	31,493,862	5,998,094	37,491,956	2,203,502	2,644,042	4,847,544	29,250,010	1,146,931	889,458	8,096,936	8,986,394	216,294	81,939,129

BOOKED TO BILLED RATIO			
Billed Revenue Target	81,939,129		
Billed Revenue	82,319,803		
Req'd Booked to Bill Adjmt	0.995375669		

CARES DISCOUNT			
Test Year CARES Discount	207307	207307	
ACC Approved Adjustment	22,38%		
Pro Forma CARES Discount	253,702		
Billed Revenue	37,919,839		
CARES Discount =	0.669%		
No. of Discounted Bills	41308		
Average CARES Discount	\$5.02		

Rate Design Worksheets

Citizens Utilities, Inc.
Arizona Electric Division

Revenue Requirements at Equalized Rates of return

	RESMO	RESSC	TotRes	SGSMO	SGSSC	TotSGS	LGS	IPS	69KV LPS	<69KV LPS	TotLPS	LTO	TOTAL
Proposed Revenue Requirements @ Equalized Rates of return													
1 System Benefits			271,204			26,144	204,923	6,877			45,715	(0)	554,863
2 Metering			1,375,607			183,757	143,299	3,117		16,685	21,909	528	1,729,217
3 Billing			827,687			110,936	86,104	1,884		303	398	317	1,027,326
4 Info systems			82,353			11,038	8,567	187		30	40	32	102,217
5 Other			349,367			46,826	36,344	795		9	168	374,193	807,700
6 Production Demand			15,257,084			1,470,547	11,528,566	386,809		40	2,571,041	(0)	31,214,048
7 Production Energy			8,421,545			874,735	6,478,950	339,847			2,134,844	36,084	18,286,004
8 T&D Demand			11,866,564			1,314,737	12,940,841	214,262		56,594	1,853,259	29,093	28,217,756
9 Total Cost to Serve			38,451,411			4,038,719	31,427,594	953,779		1,796,665	6,827,375	440,252	81,939,130
10 Less Sub-total Production			23,678,629			2,345,282	18,007,516	728,956			4,705,885	36,084	49,500,052
11 = Unbundled Total Rev Req'd			14,772,782			1,693,438	13,420,078	227,123			1,921,490	404,168	32,439,078

CARES Discount Rate = 253,702
CARES Disc (Non-Product Cost) = 32,439,078
X Book to Bill Ratio = 0.99538
= CARES Percentage = 0.7785%

Full and Equalized Costs to Serve

Allocate class costs to serve to sub-classes based on price-weighted billing determinants													
18 System Benefits	\$0.0006	\$0.0006	\$0.0006	\$0.0006	\$0.0006	\$0.0006	\$0.0006	\$0.0004	\$0.0004	\$0.0004	\$0.0004	\$0.0000	\$0.0000
19 Metering	\$2.30	\$2.30	\$2.30	\$2.30	\$2.30	\$2.30	\$2.30	\$6.87	\$435.34	\$198.63	\$3.61	\$528.42	\$316.67
20 Billing	\$1.38	\$1.38	\$1.38	\$1.38	\$1.38	\$1.38	\$1.38	\$4.15	\$0.79	\$0.36	\$1.52	\$31.51	\$374,198.86
21 Info systems	\$0.14	\$0.14	\$0.14	\$0.14	\$0.14	\$0.14	\$0.14	\$1.75	\$0.87	\$0.97	\$9.87	\$0.0000	\$0.0000
22 Other	\$0.58	\$0.58	\$0.58	\$0.58	\$0.58	\$0.58	\$0.58	\$5.66	\$0.0191	\$0.0191	\$7.12	\$29,093	\$404,168.21
23 Production Demand	\$0.0346	\$0.0346	\$0.0346	\$0.0346	\$0.0346	\$0.0346	\$0.0346	\$3.14	\$0.0191	\$0.0191	\$7.12	\$404,168.21	\$404,168.21
24 Production Energy	\$0.0191	\$0.0191	\$0.0191	\$0.0191	\$0.0191	\$0.0191	\$0.0191	\$13.19	\$0.0191	\$0.0191	\$0.0191	\$0.0191	\$0.0191
25 T&D Demand	\$19.83	\$19.83	\$19.83	\$19.83	\$19.83	\$19.83	\$19.83	\$8.80	\$11.83	\$17.64	\$17.64	\$0.01909	\$0.01909
26 Total Customer Chg	\$24.23	\$24.23	\$24.23	\$24.23	\$24.23	\$24.23	\$24.23	\$22.38	\$22.38	\$17.64	\$17.64	\$0.01909	\$0.01909
27 Total Energy Chg	\$0.05430	\$0.05430	\$0.05430	\$0.05430	\$0.05430	\$0.05430	\$0.05430	\$8.80	\$11.83	\$17.64	\$17.64	\$0.01909	\$0.01909
28 Total Demand Chg													
29 TOTAL COSTS	32,144,080	6,307,331	38,451,411	2,412,923	1,625,796	4,038,719	31,427,594	953,779	673,908	5,953,467	6,827,375	440,252	81,939,130
30 Increase to Equalized	2.065%	5.156%	2.559%	9.504%	-38.511%	-16.885%	7.445%	-16.841%	-24.234%	-26.473%	-26.251%	103.543%	0.000%

Proposed Rates - Final Step 4

All Data Adjusted for Booked to Billed and Residential Non-Production Adjusted for CARES discount													
35 System Benefits	\$0.0006	\$0.0006	\$0.0006	\$0.0006	\$0.0006	\$0.0006	\$0.0006	\$0.0004	\$0.0004	\$0.0004	\$0.0004	\$0.0000	\$0.0000
36 Metering	\$2.33	\$2.33	\$2.33	\$2.33	\$2.33	\$2.33	\$2.33	\$6.96	\$440.77	\$201.10	\$3.66	\$535.01	\$320.82
37 Billing	\$1.40	\$1.40	\$1.40	\$1.40	\$1.40	\$1.40	\$1.40	\$4.21	\$0.80	\$0.36	\$1.54	\$31.90	\$378,863.89
38 Info systems	\$0.14	\$0.14	\$0.14	\$0.14	\$0.14	\$0.14	\$0.14	\$1.77	\$0.92	\$0.92	\$9.92	\$0.0000	\$0.0000
39 Other	\$0.59	\$0.59	\$0.59	\$0.59	\$0.59	\$0.59	\$0.59	\$5.69	\$0.0192	\$0.0192	\$7.15	\$29,455.44	\$409,206.86
40 Production Demand	\$0.0348	\$0.0348	\$0.0348	\$0.0348	\$0.0348	\$0.0348	\$0.0348	\$3.15	\$0.0192	\$0.0192	\$7.15	\$409,206.86	\$409,206.86
41 Production Energy	\$0.0192	\$0.0192	\$0.0192	\$0.0192	\$0.0192	\$0.0192	\$0.0192	\$13.35	\$0.0192	\$0.0192	\$0.0192	\$0.0192	\$0.0192
42 T&D Demand	\$20.07	\$20.07	\$20.07	\$20.07	\$20.07	\$20.07	\$20.07	\$8.86	\$11.98	\$17.86	\$17.86	\$0.01918	\$0.01918
43 Total Customer Chg	\$24.53	\$24.53	\$24.53	\$24.53	\$24.53	\$24.53	\$24.53	\$22.58	\$22.58	\$17.78	\$17.78	\$0.01918	\$0.01918
44 Total Energy Chg	\$0.05456	\$0.05456	\$0.05456	\$0.05456	\$0.05456	\$0.05456	\$0.05456	\$8.86	\$11.90	\$17.78	\$17.78	\$0.01918	\$0.01918
45 Total Demand Chg													
46 Billings before CARES Disc	32,387,314	6,358,271	38,745,585	2,433,010	1,637,716	4,070,726	31,678,558	958,986	677,577	5,995,615	6,873,192	445,459	82,573,506
47 LESS CARES Discount	213,114	40,568	253,702	2,433,010	1,637,716	4,070,726	31,678,558	958,986	677,577	5,995,615	6,873,192	445,459	82,573,506
48 TOTAL BILLED	32,174,200	6,317,683	38,491,883	2,433,010	1,637,716	4,070,726	31,678,558	958,986	677,577	5,995,615	6,873,192	445,459	82,573,506
49 Percent Increase	1.988%	4.841%	2.192%	9.905%	-38.347%	-16.413%	7.802%	-16.887%	-24.174%	-26.294%	-26.085%	104.885%	0.006%

Rate Design Worksheets

Citizens Utilities, Inc.
Arizona Electric Division

Tabulation of Phased Rate Plan

Standard Offer Rates and Resulting Revenues													
	RESMO	RESSC	TotRes	SGSMO	SGSSC	TotSGS	LGS	IPS	69kV LPS	<69kV LPS	TotLPS	LTG	TOTAL
1 Billing Units													
2 NO. OF BILLS	485,943	112,499	598,442	31,713	15,480	47,173	36,622	454	12	84	96	1	682,788
3 DEMAND	0	0	0	0	0	0	1,093,426	68,311	28,966	231,409	260,375	0	1,422,112
4 ENERGY	375,093,610	65,949,375	441,042,985	24,955,351	20,847,715	45,803,066	339,316,393	17,794,167	16,705,500	95,060,824	111,766,324	1,890,000	957,612,936
5													
6													
7													
8 Present Rates													
9 Customer, \$/Customer/Month	\$6.50	\$6.50		\$10.00	\$10.00		\$10.10	\$10.10	\$800.00	\$365.00		\$217,299.10	
10 Demand, \$/kW	\$0.000	\$0.000		\$0.000	\$0.000		\$9.500	\$2.500	\$16.100	\$24.750		\$0.0000	
11 Energy, \$/kWh	\$0.07650	\$0.08090		\$0.07600	\$0.12000		\$0.05490	\$0.05490	\$0.02500	\$0.02500		\$0.00000	
12 Billed Revenue	31,853,281	6,066,548	37,919,839										
13 less CARES Discount	213,114	40,588	253,702										
14 Billed Rev Net of CARES	31,640,177	6,025,960	37,666,136										
15													
16													
17 Step 1, 1/1/99													
18 Customer, \$/Customer/Month	\$11.01	\$11.01		\$16.45	\$16.45		\$9.47	\$10.91	\$713.24	\$325.42		\$236,489.87	
19 Demand, \$/kW	\$0.000	\$0.000		\$0.000	\$0.000		\$12.770	\$4.090	\$15.050	\$23.010		\$0.000	
20 Energy, \$/kWh	\$0.07100	\$0.07430		\$0.07000	\$0.10300		\$0.04610	\$0.04610	\$0.02370	\$0.02370		\$0.00480	
21 Billed Revenue	31,981,879	6,138,653	38,120,531										
22 less CARES Discount	213,114	40,588	253,702										
23 Billed Rev Net of CARES	31,768,765	6,098,064	37,866,829										
24 Cumulative Increase	0.41%	1.20%	0.53%	2.48%	-9.59%	-4.10%	1.93%	-4.13%	-5.95%	-8.51%	-8.45%	13.01%	-0.04%
25													
26 Step 2, 1/1/2000													
27 Customer, \$/Customer/Month	\$15.52	\$15.52		\$22.89	\$22.89		\$8.84	\$11.73	\$626.48	\$285.83		\$294,062.20	
28 Demand, \$/kW	\$0.000	\$0.000		\$0.000	\$0.000		\$16.040	\$5.680	\$14.000	\$21.270		\$0.000	
29 Energy, \$/kWh	\$0.06550	\$0.06770		\$0.06400	\$0.08600		\$0.03730	\$0.03720	\$0.02230	\$0.02230		\$0.00960	
30 Billed Revenue	32,110,487	6,210,757	38,321,224										
31 less CARES Discount	213,114	40,588	253,702										
32 Billed Rev Net of CARES	31,897,353	6,170,169	38,067,522										
33 Cumulative Increase	0.81%	2.39%	1.07%	4.84%	-18.18%	-8.22%	3.86%	-8.42%	-12.08%	-13.14%	-13.03%	43.88%	-0.05%
34													
35 Step 3, 1/1/2001													
36 Customer, \$/Customer/Month	\$20.03	\$20.03		\$29.34	\$29.34		\$8.21	\$12.54	\$539.73	\$246.25		\$351,634.53	
37 Demand, \$/kW	\$0.000	\$0.000		\$0.000	\$0.000		\$19.310	\$7.270	\$12.950	\$19.520		\$0.000	
38 Energy, \$/kWh	\$0.06000	\$0.06110		\$0.05900	\$0.06900		\$0.02860	\$0.02840	\$0.02100	\$0.02100		\$0.01440	
39 Billed Revenue	32,239,055	6,282,862	38,521,817										
40 less CARES Discount	213,114	40,588	253,702										
41 Billed Rev Net of CARES	32,025,941	6,242,274	38,268,214										
42 Cumulative Increase	1.22%	3.59%	1.80%	7.41%	-28.77%	-12.32%	5.90%	-12.55%	-18.04%	-18.68%	-18.51%	74.35%	-0.01%
43													
44 Step 4, 1/1/2002													
45 Customer, \$/Customer/Month	\$24.53	\$24.53		\$35.78	\$35.78		\$7.58	\$13.35	\$452.97	\$206.67		\$409,206.86	
46 Demand, \$/kW	\$0.000	\$0.000		\$0.000	\$0.000		\$22.580	\$8.860	\$11.900	\$17.780		\$0.000	
47 Energy, \$/kWh	\$0.05460	\$0.05460		\$0.05200	\$0.05200		\$0.01980	\$0.01960	\$0.01960	\$0.01960		\$0.01920	
48 Billed Revenue	32,400,293	6,360,436	38,760,729										
49 less CARES Discount	213,114	40,588	253,702										
50 Billed Rev Net of CARES	32,187,179	6,319,848	38,507,027										
51 Cumulative Increase	1.73%	4.88%	2.23%	9.88%	-38.36%	-16.44%	7.83%	-16.68%	-24.18%	-26.30%	-26.08%	105.01%	0.02%

Note: Revenues shown above exclude booked to billed adjustment of 99.54%

Rate Design Worksheets

Citizens Utilities, Inc.
Arizona Electric Division

Development of Unbundled Rates - Step 4

	RESMO	RESSC	TotRes	SGSMO	SGSSC	TotSGS	LGS	IPS	69KV/LPS	<69KV/LPS	TotLPS	LTG	TOTAL
1 Billing Units													
2 NO. OF BILLS	485,943	112,499	598,442	31,713	15,460	47,173	36,622	454	12	84	96	1	682,788
3 DEMAND	0	0	0	0	0	0	1,093,426	68,311	28,966	231,409	260,375	0	1,422,112
4 ENERGY	375,093,610	65,949,375	441,042,985	24,955,351	20,847,715	45,803,066	339,316,393	17,794,167	16,705,500	95,060,824	111,766,324	1,890,000	957,612,936
5 Development of Transmission and Distribution Unbundled Rates													
6 T&D Cost Study-based Rate	\$20.0746	\$20.0746	\$20.0746	\$28.2178	\$28.2178	\$28.2178	\$11.9827	\$3.1757	\$1,9782	\$7,8608	\$7,1507	\$29,455,4364	
7 X T&D Billing Units	485,943	112,499	598,442	31,713	15,460	47,173	1,093,426	68,311	28,966	231,409	260,375	1	2,067,728
8 = T&D Revenue	9,755,115	2,258,373	12,013,488	894,880	436,248	1,331,127	13,102,171	216,933	57,300	1,819,064	1,861,869	29,455	28,555,044
9 FERC Trans Revenue			1,809,849			174,528	1,367,563	45,881	49,467	255,600	318,972	0	3,716,794
10 / Billing Units			598,442			47,173	1,093,426	68,311	28,966	231,409	260,375	1	
11 = Transmission Rate	\$3.02	\$3.02	\$3.02	\$3.70	\$3.70	\$3.70	\$1.25	\$0.67	\$1.71	\$1.10	\$1.23	\$0.00	
12 Residual T&D Revenue			10,203,639			1,156,599	11,734,608	171,052	7,832	1,563,464	1,542,897	29,455	24,838,250
13 / Billing Units			598,442			47,173	1,093,426	68,311	28,966	231,409	260,375	1	
14 = Distribution Rate	\$17.05	\$17.05	\$17.05	\$24.52	\$24.52	\$24.52	\$10.73	\$2.50	\$0.27	\$6.76	\$5.93	\$29,455,44	
15													
16													
17													
18													
19 Summary of Unbundled Rates													
20 T & D rates from above, other rates from standard offer worksheets (rounded as shown)													
21													
22 Customer Billed Rates													
23 Transmission	\$3.02	\$3.02		\$3.70	\$3.70		\$3.96	\$6.96	\$440.77	\$201.10		\$0.00	
24 Distribution	\$17.05	\$17.05		\$24.52	\$24.52		\$2.38	\$4.21	\$8.02	\$3.66		\$29,455,44	
25 Metering	\$2.33	\$2.33		\$3.94	\$3.94		\$0.24	\$0.42	\$0.80	\$0.36		\$535.01	
26 Billing	\$1.40	\$1.40		\$0.24	\$0.24		\$1.00	\$1.71	\$3.38	\$1.54		\$320.62	
27 Info systems	\$0.14	\$0.14		\$0.01	\$0.01		\$7.58	\$13.35	\$452.87	\$206.67		\$31.90	
28 Other	\$0.59	\$0.59		\$35.79	\$35.79							\$375,863.89	
29 Total Customer Charge	\$24.53	\$24.53										\$409,206.86	
30 (May not add due to rounding)													
31													
32 Demand Billed Rates													
33 Transmission							\$1.26	\$0.67	\$1.71	\$1.10		\$0.00	
34 Distribution							\$10.73	\$2.50	\$0.27	\$6.76		\$0.00	
35 Total Demand Charge	\$0.00	\$0.00		\$0.00	\$0.00		\$11.98	\$3.17	\$1.98	\$7.86		\$0.00	
36 (May not add due to rounding)													
37													
38 Energy Billed Rates													
39 System benefits	\$0.00062	\$0.00062		\$0.00058	\$0.00058		\$0.00061	\$0.00039	\$0.00041	\$0.00041		\$0.00000	

Rate Design Worksheets

Citizens Utilities, Inc.
Arizona Electric Division

Unbundled Rate Revenue Proof - Step 4

	RESMO	RESSC	ToiRes	SGSMO	SGSSC	Tot SGS	LGS	IPS	69KV LPS	<69KV LPS	Tot LPS	LTG	TOTAL
1 Billing Units													
2 NO. OF BILLS	485,943	112,499	598,442	31,713	15,460	47,173	36,622	454	12	84	96	1	682,788
3 DEMAND	0	0	0	0	0	0	1,093,426	68,311	28,966	231,409	260,375	0	1,422,112
4 ENERGY	375,093,610	65,949,375	441,042,985	24,955,351	20,847,715	45,803,066	339,316,393	17,794,167	16,705,500	95,060,824	111,766,324	1,890,000	957,612,936
5													
6													
7													
8 Total of Unbundled Rates													
9 Total Customer Chg	\$24.53	\$24.53		\$35.79	\$35.75	1,688,331	\$7.58	\$13.35	\$452.97	\$206.67		\$409,206.86	
10 Total Demand Chg	\$0.00	\$0.00		\$0.00	\$0.00	0	\$11.98	\$3.17	\$1.98	\$7.86		\$0.00	
11 Total Energy Chg	\$0.0062	\$0.0062		\$0.00058	\$0.00058	0	\$0.00061	\$0.00039	\$0.00041	\$0.00041		\$0.00000	
12 Revenues Produced													
13 Customer Revenue	11,920,182	2,759,600	14,679,782	1,135,017	553,313	1,688,331	277,595	6,057	5,436	17,360	22,796	409,207	17,083,768
14 Demand Revenue	0	0	0	0	0	0	13,099,243	216,546	57,353	1,818,875	1,876,227	0	15,192,017
15 Energy Revenue	232,558	40,889	273,447	14,474	12,092	26,566	206,983	6,940	6,849	38,975	45,824	0	559,769
16 Total Revenue	12,152,740	2,800,489	14,953,229	1,149,491	565,405	1,714,897	13,583,822	229,542	69,638	1,875,210	1,944,848	409,207	32,835,544
17													
18													
19													
20 LESS CARES Discount	213,114	40,588	253,702										
21													
22 TOTAL BILLED	11,939,626	2,759,901	14,699,527	1,149,491	565,405	1,714,897	13,583,822	229,542	69,638	1,875,210	1,944,848	409,207	32,581,841
23 Percent of Std Offer Rates	37.11%	43.69%	38.19%	47.25%	34.52%	42.13%	42.89%	23.91%	10.28%	31.28%	29.14%	91.86%	39.56%
24													
25													
26 X Book to Bill Adjustment	0.995376	0.995376	0.995376	0.995376	0.995376	0.995376	0.995376	0.995376	0.995376	0.995376	0.995376	0.995376	
27 = Book Revenue Produced	11,884,413	2,747,138	14,631,551	1,144,176	562,790	1,706,966	13,521,006	228,481	69,316	1,866,538	1,935,854	407,315	32,431,172
28													
29													
30 Cost to Serve at Equalized ROR			14,772,782		1,693,438	1,693,438	13,420,078	227,123			1,921,490	404,168	32,439,078
31 CARES Subsidy and Rate Design			(141,231)		13,529	13,529	100,928	1,358			14,364	3,146	(7,906)
32 Rounding Error													

Citizens Utilities, Inc.
Arizona Electric Division

Allocation of Present Rates to Unbundled Cost Functions

	RESMO	RESSC	TotRes	SGSMO	SGSSC	TotSGS	LGS	IPS	99KV LPS	<69KV LPS	TotLPS	LTG	TOTAL
Functional Revenue Requirements @Current Rates													
1 System Benefits			271,849			25,677	206,036	6,687			43,893	0	554,142
2 Metering			1,313,156			247,629	128,226	4,797			38,976	326	1,733,110
3 Billing			829,626			108,984	86,564	1,833			383	323	1,027,713
4 Info systems			82,547			10,843	8,613	182			38	32	102,255
5 Other			350,197			45,990	36,542	773			162	166,667	600,331
6 Production Demand			15,267,036			1,463,341	11,545,739	383,875			2,542,923	0	31,202,913
7 Production Energy			8,437,889			861,984	6,507,684	332,176			2,065,393	36,667	18,241,772
8 T&D Demand			10,939,855			2,083,096	10,730,627	416,608			4,294,628	12,279	28,476,892
9 Total Cost to Serve			37,491,956			4,847,544	29,250,010	1,146,931		4,094,037	8,986,394	216,294	81,939,129
10													
11													
12 Customer Revenue	2,945,515	690,655	3,636,171	317,133	154,800	471,733	369,883	4,582	9,600	30,660	40,260	217,298	4,739,927
13 Book to Billed Adjustment	0.995375669	0.995375669		0.995375669	0.995375669		0.995375669	0.995375669	0.995375669	0.995375669		0.995375669	
14 Customer net revenue	2,931,894	687,462	3,619,356	315,666	153,885	469,551	368,172	4,561	9,556	30,518	40,074	216,294	4,718,008
15													
Allocation of Costs to Sub-Classes													
16													
17													
18 System Benefits	228,959	42,891	271,849	11,150	14,526	25,677	206,036	6,687	6,410	37,482	43,893	0	554,142
19 Metering	1,063,735	249,421	1,313,156	166,474	81,155	247,629	128,226	4,797	9,294	29,682	38,976	326	1,733,110
20 Billing	672,047	157,579	829,626	73,267	35,717	108,984	86,564	1,833	91	292	383	323	1,027,713
21 Info systems	66,868	15,679	82,547	7,289	3,554	10,843	8,613	182	9	29	38	32	102,255
22 Other	283,681	66,517	350,197	30,918	15,072	45,990	36,542	773	39	123	162	166,667	600,331
23 Production Demand	12,858,298	2,408,738	15,267,036	635,471	827,870	1,463,341	11,545,739	383,875	371,383	2,171,540	2,542,923	0	31,202,913
24 Production Energy	7,106,611	1,331,278	8,437,889	374,326	487,658	861,984	6,507,684	332,176	301,642	1,763,751	2,065,393	36,667	18,241,772
25 T&D Demand	9,213,664	1,725,981	10,939,645	904,606	1,178,489	2,083,096	10,730,627	416,608	200,591	4,094,037	4,294,628	12,279	28,476,892
26 Total Cost to Serve	31,493,862	5,996,094	37,491,956	2,203,502	2,644,042	4,847,544	29,250,010	1,146,931	889,458	8,096,936	8,986,394	216,294	81,939,129
27													
28													
29													
30													
31													
Adjust Allocated Costs to Compute Allocated Prices													
32													
33 System Benefits	234,236	43,879	278,115	11,202	14,594	25,796	206,993	6,718	6,440	37,657	44,097	0	581,719
34 Metering	1,088,251	255,170	1,343,421	167,248	81,532	248,780	128,822	4,819	9,337	29,820	39,157	328	1,765,326
35 Billing	687,535	161,211	848,747	73,607	35,883	109,490	86,966	1,841	92	293	385	324	1,047,754
36 Info systems	68,409	16,040	84,449	7,323	3,570	10,893	8,653	183	9	29	38	32	104,249
37 Other	290,219	68,050	358,269	31,062	15,142	46,204	36,711	777	39	124	162	167,441	609,564
38 Production Demand	12,918,035	2,419,929	15,337,964	638,424	831,716	1,470,140	11,599,378	385,658	373,108	2,181,629	2,554,737	0	31,347,876
39 Production Energy	7,139,627	1,337,463	8,477,090	376,065	489,924	865,988	6,537,897	333,719	303,043	1,771,945	2,074,988	36,837	18,326,520
40 T&D Demand	9,426,014	1,765,770	11,191,785	908,809	1,183,965	2,092,773	10,780,479	418,544	201,522	4,113,057	4,314,580	12,336	28,810,497
41 Total Cost to Serve	31,852,927	6,067,512	37,919,839	2,213,739	2,656,326	4,870,065	29,385,900	1,152,259	893,590	8,134,553	9,028,143	217,299	82,573,505

Citizens Utilities, Inc.
Arizona Electric Division

Allocation of Present Rates to Unbundled Cost Functions (Continued)

	RESMO	RESSC	TotRes	SGSMO	SGSSC	TotSGS	LGS	IPSS	69KV LPS	<69KV LPS	Tot LPS	LIG	TOTAL
Billed Revenues Produced by Current Rates													
1 Customer Revenues	3,158,630	731,244	3,889,873	317,133	154,600	471,733	369,883	4,582	9,600	30,660	40,260	217,299	4,993,630
2 Demand Revenues	0	0	0	0	0	0	10,387,547	170,778	466,353	5,727,373	6,193,725	0	18,752,050
3 Energy Revenues	28,694,661	5,335,304	34,029,966	1,896,607	2,501,726	4,398,333	18,628,470	976,900	417,638	2,378,521	2,794,158	0	60,827,626
4 Total Current Revenue	31,853,291	6,066,548	37,919,839	2,213,739	2,656,326	4,870,065	29,395,900	1,152,259	893,590	8,134,553	9,028,143	217,299	82,573,506
5													
6													
7													
8													
Assignment of Current Rates to the Underlying Functional Costs to Serve.													
CUSTOMER													
11 Customer Revenue	3,158,630	731,244	3,889,873	317,133	154,600	471,733	369,883	4,582	9,600	30,660	40,260	217,299	4,993,630
12 less Customer Costs													
13 Metering	1,088,251	255,170	1,343,421	167,248	81,532	248,780	128,822	2,898	9,337	29,820	39,157	328	1,763,405
14 Billing	667,535	161,211	828,747	73,607	35,883	109,490	86,966	1,107	92	293	385	324	1,047,019
15 Info systems	88,409	18,040	106,449	7,323	3,570	10,893	8,653	110	9	29	38	32	104,176
16 Other	290,219	88,050	378,269	31,062	15,142	46,204	36,711	487	39	124	162	167,441	809,254
17 Total Customer costs	2,134,414	500,471	2,634,885	279,240	136,128	415,367	281,153	4,582	9,477	30,266	39,742	188,128	3,523,855
18													
19 = Customer Revenue	1,024,215	230,773	1,254,988	37,893	18,472	56,365	108,730	0	123	394	518	49,173	1,469,775
20 Recovering Demand													
21 Energy for Ligt Costs													
22													
23													
24													
25													
ENERGY													
26 Energy Revenue	28,694,661	5,335,304	34,029,966	1,896,607	2,501,726	4,398,333	18,628,470	976,900	417,638	2,378,521	2,794,158	0	60,827,626
27 less Energy Costs													
28 Production Energy	7,139,627	1,337,463	8,477,090	376,065	489,924	865,989	6,537,897	333,719	309,043	1,771,945	2,074,988	36,837	18,328,520
29 System Benefits	234,236	43,879	278,115	11,202	14,594	25,796	206,993	6,718	6,440	37,657	44,097	0	561,719
30 Total Energy Costs	7,373,863	1,381,342	8,755,205	387,267	504,518	891,784	6,744,890	340,437	309,483	1,809,602	2,119,085	36,837	18,888,239
31													
32 = Energy Revenue	21,320,798	3,953,963	25,274,761	1,509,340	1,997,208	3,506,548	11,883,580	636,462	108,154	566,919	675,073	(36,837)	41,939,567
33 Recovering Demand													
34 or Customer Costs													
35 less Energy Rev Recov Customer Costs													
36 Metering	0	0	0	0	0	0	0	1,899	0	0	0	0	1,899
37 Billing	0	0	0	0	0	0	0	726	0	0	0	0	726
38 Info systems	0	0	0	0	0	0	0	72	0	0	0	0	72
39 Other	0	0	0	0	0	0	0	306	0	0	0	0	306
40 Total	0	0	0	0	0	0	0	3,003	0	0	0	0	3,003
41													
42 = Eng Rev Recov Dmd	21,320,798	3,953,963	25,274,761	1,509,340	1,997,208	3,506,548	11,883,580	633,459	108,154	566,919	675,073	(36,837)	41,939,567
43													
44													
45													
46													
DEMAND													
47 Recovered in Customer	1,024,215	230,773	1,254,988	37,893	18,472	56,365	108,730	0	123	394	518	49,173	1,469,775
48 Recovered in Energy	21,320,798	3,953,963	25,274,761	1,509,340	1,997,208	3,506,548	11,883,580	633,459	108,154	566,919	675,073	(36,837)	41,939,567
49 Total	22,345,013	4,184,735	26,529,749	1,547,233	2,015,681	3,562,913	11,992,310	633,459	108,278	567,313	675,591	12,336	43,406,323
50													
51 Demand costs													
52 Production Demand	12,918,035	2,419,929	15,337,964	638,424	831,716	1,470,140	11,599,378	385,658	373,108	2,181,629	2,554,737	0	31,347,876
53 T&D Demand	9,426,014	1,765,770	11,191,785	908,809	1,183,965	2,092,773	10,780,479	418,544	201,522	4,113,057	4,314,580	12,336	28,810,497
54 Total	22,344,050	4,185,699	26,529,749	1,547,233	2,015,681	3,562,913	22,379,857	804,202	574,631	6,294,686	6,869,316	12,336	60,158,373
55													
56 Demand Revenue	0	0	0	0	0	0	0	170,778	466,353	5,727,373	6,193,725	0	16,752,050
57 Costs recovered elsewhere													
58													
59													

Citizens Utilities, Inc.
Arizona Electric Division

Allocation of Present Rates to Unbundled Cost Functions (Continued)

	RESMO	RESCC	TotRes	SGSMO	SGSSC	TotSGS	LOS	IPS	69KV/LPS	<69KV/LPS	TotLPS	LTG	TOTAL
1 NO. OF BILLS	485,943	112,499	598,442	31,713	15,460	47,173	36,622	454	12	84	96	1	692,768
2 DEMAND	0	0	0	0	0	0	1,083,426	88,311	28,966	231,409	280,375	0	1,422,112
3 ENERGY	375,093,610	65,949,375	441,042,985	24,955,351	20,847,715	45,803,066	339,316,393	17,794,167	16,705,500	95,060,924	111,766,324	1,890,000	957,612,936
4													
5 Allocation of Demand Costs to Customer and Energy Charges													
6 to Customer Charges													
7 Production Demand	592,142	133,419	725,561		7,622	23,258	56,354	0	80	137	217	0	805,390
8 T&D Demand	432,073	97,353	529,427		10,850	33,108	52,376	0	43	258	301	12,336	627,547
9 Total in Cust Charge	1,024,215	230,773	1,254,988		18,472	56,365	108,730	0	123	394	518	12,336	1,432,938
10													0
11 to Energy Charges													
12 Production Demand	12,326,451	2,285,952	14,612,403	622,788	824,094	1,446,882	6,159,205	303,778	70,225	196,484	266,709	0	22,788,977
13 T&D Demand	8,994,348	1,668,010	10,662,358	886,552	1,173,114	2,059,666	5,724,375	329,681	37,930	370,435	408,364	0	19,184,444
14 Total in Energy Charge	21,320,798	3,953,963	25,274,761	1,509,340	1,997,208	3,506,548	11,883,580	633,459	108,154	566,919	675,073	0	41,973,421
15													
16													
17 Allocation of Demand Costs to Demand Charges													
18 to Demand Charges													
19 Production Demand	0	0	0	0	0	0	5,383,818	81,897	302,803	1,985,008	2,287,811	0	7,753,526
20 T&D Demand	0	0	0	0	0	0	5,003,729	88,880	183,550	3,742,365	3,905,914	0	8,998,524
21 Total in Cust Charge	0	0	0	0	0	0	10,387,547	170,778	486,353	5,727,373	6,193,725	0	16,752,050
22													36,837
23 Allocation of Energy Costs to Customer Charges													
24													
25 Summary of Cost Recovery by Rate and Function													
26													
27 Customer Charges													
28 Production Energy	1,088,251	255,170	1,343,421	167,246	81,532	248,780	128,822	2,898	9,337	29,820	39,157	36,837	1,763,405
29 Metering	687,535	161,211	848,747	73,607	35,883	109,490	86,966	1,107	92	283	385	328	1,047,019
30 Billing	68,409	16,040	84,449	7,323	3,570	10,893	8,653	110	9	29	38	32	104,176
31 Info systems	290,219	68,050	358,268	31,062	15,142	46,204	36,711	467	39	124	162	167,441	609,254
32 Other	592,142	133,419	725,561	15,635	7,622	23,258	56,354	0	80	137	217	0	805,390
33 Production Demand	432,073	97,353	529,427	22,257	10,850	33,108	52,376	0	43	258	301	12,336	627,547
34 T&D Demand	3,158,630	731,244	3,889,873	317,133	154,600	471,733	369,883	4,582	9,600	30,660	40,260	217,299	4,993,630
35 Total Customer Charges													
36													
37 Energy Charges													
38 Metering	0	0	0	0	0	0	0	1,899	0	0	0	0	1,899
39 Billing	0	0	0	0	0	0	0	726	0	0	0	0	726
40 Info systems	0	0	0	0	0	0	0	72	0	0	0	0	72
41 Other	0	0	0	0	0	0	0	308	0	0	0	0	308
42 Production Energy	7,139,627	1,337,463	8,477,090	376,065	489,924	865,988	6,537,897	333,719	303,043	1,771,945	2,074,988	0	18,289,683
43 System Benefits	234,236	43,879	278,115	11,202	14,594	25,796	206,993	6,718	6,440	37,657	44,097	0	561,719
44 Production Demand	12,326,451	2,285,952	14,612,403	622,788	824,094	1,446,882	6,159,205	303,778	70,225	196,484	266,709	0	22,788,977
45 T&D Demand	8,994,348	1,668,010	10,662,358	886,552	1,173,114	2,059,666	5,724,375	329,681	37,930	370,435	408,364	0	19,184,444
46 Total Energy Charge	28,694,661	5,335,304	34,029,966	1,896,607	2,501,726	4,398,333	18,628,470	976,900	417,638	2,376,521	2,794,156	0	60,827,826
47													
48 Demand Charges													
49 Production Demand							5,383,818	81,897	302,803	1,985,008	2,287,811		7,753,526
50 T&D Demand							5,003,729	88,880	163,550	3,742,365	3,905,914		8,998,524
51 Total Demand Charges							10,387,547	170,778	486,353	5,727,373	6,193,725	0	16,752,050
52													
53													
54 Total Charges	31,853,291	6,066,548	37,919,839	2,213,739	2,556,326	4,870,065	29,385,900	1,152,259	893,590	6,134,553	9,028,143	217,299	82,573,506
55													

Citizens Utilities, Inc.
Arizona Electric Division

Functional Unit Costs in Current Rates - Present Rates

	RESMO	RESSC	TotRes	SOSMO	SGSSC	TotSGS	LGS	IPS	69kV LPS	<69kV LPS	Tot LPS	LTG	TOTAL
1 NO. OF BILLS	485,943	112,489	598,442	31,713	15,480	47,173	36,622	454	12	84	96	1	682,788
2 DEMAND	0	0	0	0	0	0	1,093,426	68,311	28,966	231,409	260,375	0	1,422,112
3 ENERGY	375,093,610	65,949,375	441,042,985	24,955,351	20,847,715	45,803,066	339,316,393	17,794,167	16,705,500	95,060,824	111,766,324	1,890,000	957,612,936
4													
5													
6 Total Functional Costs In Current Rates Divided by Billing Units													
7 Customer Charges													
8 Metering	\$2.24	\$2.27		\$5.27	\$5.27		\$3.52	\$6.39	\$778.08	\$355.00		\$36,837.06	
9 Billing	1.41	1.43		2.32	2.32		2.37	2.44	7.64	3.49		327.96	
10 Info systems	0.14	0.14		0.23	0.23		0.24	0.24	0.76	0.35		324.35	
11 Other	0.60	0.60		0.98	0.98		1.00	1.03	3.22	1.47		167,441.44	
12 Production Demand	1.22	1.19		0.49	0.49		1.54	0.00	6.68	1.63		0.00	
13 T&D Demand	0.89	0.87		0.70	0.70		1.43	0.00	3.61	3.07		123,36.02	
14 Total Customer Charges	\$6.50	\$6.50		\$10.00	\$10.00		\$10.10	\$10.10	\$800.00	\$365.00		217,299	
15													
16													
17													
18													
19													
20													
21 Energy Charges													
22 Production Energy	\$0.0190	\$0.0203		\$0.0151	\$0.0235		\$0.0193	\$0.0188	\$0.0181	\$0.0186		\$0.0000	
23 System Benefits	0.0006	0.0007		0.0004	0.0007		0.0005	0.0004	0.0004	0.0004		0.0000	
24 Production Demand	0.0329	0.0347		0.0250	0.0395		0.0182	0.0171	0.0042	0.0021		0.0000	
25 T&D Demand	0.0240	0.0253		0.0355	0.0563		0.0169	0.0185	0.0023	0.0039		0.0000	
26 Total Energy Charge	\$0.0765	\$0.0809		\$0.0760	\$0.1200		\$0.0549	\$0.0549	\$0.0250	\$0.0250		\$0.0000	
27													
28													
29													
30													
31													
32 Demand Charges													
33 Production Demand							\$4.92	\$1.20	\$10.45	\$8.58			
34 T&D Demand							4.58	1.30	5.65	16.17			
35 Total Demand Charges							\$9.50	\$2.50	\$16.10	\$24.75			

Citizens Utilities, Inc.
Arizona Electric Division

Separation of Transmission and Distribution Rates

Separation of Transmission and Distribution Costs													
Unbundling T&D Function													
	RESMO	RESSC	TotRes	SGSMO	SGSSC	TotSGS	LGS	IPS	69KV/LPS	<69KV/LPS	TotLPS	LTG	TOTAL
Customer Charges													
T&D Demand	0.89	0.87		0.70	0.70		1.43	0.00	3.61	3.07		12336.02	37,077
Billing Units	485,943	112,499		31,713	15,460		36,622	454	12	84		12,336	64,712
Billed Revenue	432,073	97,353		22,257	10,850		52,376	0	43	258			
Energy Charges													
T&D Demand	0.0240	0.0253		0.0355	0.0563		0.0169	0.0185	0.0023	0.0039		0.0000	359,000,561
Billing Units	375,093,610	65,949,375		24,955,351	20,847,715		339,316,393	17,794,167	16,705,500	95,060,824		1,890,000	6,054,056
Billed Revenue	8,994,348	1,668,010		886,552	1,173,114		5,724,375	329,681	37,930	370,435		0	
Demand Charges													
T&D Demand	0	0		0	0		4.58	1.30	5.65	16.17		0	1,161,737
Billing Units	0	0		0	0		1,093,426	68,311	28,966	231,409		0	5,092,609
Billed Revenue	0	0		0	0		5,003,729	88,880	163,550	3,742,365		0	
Total T&D Revenues	9,426,421	1,765,364		908,809	1,183,985	0	10,780,479	418,562	201,523	4,113,057	0	12,336	11,211,377
FERC Trans Revenue from Workpapers	1,540,783	269,066		97,136	77,392	174,528	1,367,563	45,881	49,467	255,600	318,972	0	1,906,944
Distribution Revenue	7,885,638	1,496,297		811,673	1,106,572		9,412,916	372,681	152,055	3,857,457		12,336	9,797,933
Allocation between T&D Transmission	16.345%	15.241%		10.688%	6.537%		12.866%	10.962%	24.547%	6.214%		0.000%	
Distribution	83.655%	84.759%		89.312%	93.463%		87.314%	89.038%	75.453%	93.786%		100.000%	
Customer T&D Rates	\$0.15	\$0.13		\$0.08	\$0.05		\$0.18	\$0.00	\$0.89	\$0.19		\$0.00	0
Transmission	\$0.74	\$0.73		\$0.63	\$0.66		\$1.25	\$0.00	\$2.72	\$2.88		\$12,336.02	12,337
Energy T&D Rates	\$0.0039	\$0.0039		\$0.0038	\$0.0037		\$0.0021	\$0.0020	\$0.0006	\$0.0002		\$0.0000	
Transmission	\$0.0201	\$0.0214		\$0.0317	\$0.0526		\$0.0147	\$0.0165	\$0.0017	\$0.0037		\$0.0000	
Demand T&D Rates	\$0.00	\$0.00		\$0.00	\$0.00		\$0.58	\$0.14	\$1.39	\$1.00		\$0.00	
Transmission	\$0.00	\$0.00		\$0.00	\$0.00		\$4.00	\$1.16	\$4.26	\$15.17		\$0.00	

Citizens Utilities, Inc.
Arizona Electric Division

Unbundled Present Rates (Excluding Production)													
Summary of Current Unbundled Rates													
	RESMO	RESSC	TotRes	SGSMO	SGSSC	TotSGS	LGS	IPS	69kV LPS	<69kV LPS	Tot LPS	LTG	TOTAL
1 Customer Charges													
2 Metering	\$2.24	\$2.27		\$5.27	\$5.27		\$3.52	\$6.39	\$778.08	\$355.00		\$38,837.06	
3 Billing	1.41	1.43		2.32	2.32		2.37	2.44	7.84	3.49		327.96	
4 Info systems	0.14	0.14		0.23	0.23		0.24	0.24	0.76	0.35		324.35	
5 Other	0.60	0.60		0.98	0.98		1.00	1.03	3.22	1.47		32.27	
6 Transmission	0.15	0.13		0.08	0.05		0.18	0.00	0.89	0.19		187,441.44	
7 Distribution	0.74	0.73		0.63	0.66		1.25	0.00	2.72	2.88		0.00	
8 Total Customer Charges	\$5.28	\$5.31		\$9.51	\$9.51		\$8.56	\$10.10	\$793.32	\$363.37		\$217,299.10	
9													
10 Energy Charges													
11 System Benefits	\$0.0008	\$0.0007		\$0.0004	\$0.0007		\$0.0006	\$0.0004	\$0.0004	\$0.0004		\$0.0000	
12 Transmission	0.0039	0.0039		0.0038	0.0037		0.0021	0.0020	0.0008	0.0002		0.0000	
13 Distribution	0.0201	0.0214		0.0317	0.0526		0.0147	0.0185	0.0017	0.0037		0.0000	
14 Total Energy Charge	\$0.0246	\$0.0260		\$0.0360	\$0.0570		\$0.0175	\$0.0189	\$0.0027	\$0.0043		\$0.0000	
15													
16 Demand Charges													
17 Distribution	\$0.00	\$0.00		\$0.00	\$0.00		\$0.58	\$0.14	\$1.39	\$1.00		\$0.00	
18 Total Demand Charges	\$0.00	\$0.00		\$0.00	\$0.00		\$4.58	\$1.30	4.26	15.17		0.00	
19									\$5.85	\$18.17		\$0.00	
20													
21													
22													
23													
24													
25													
26 Revenue Proof													
27													
28 Customer	\$5.28	\$5.31		\$9.51	\$9.51		\$8.56	\$10.10	\$793.32	\$363.37		\$180,462.04	
29 Billing Units	485,943	112,499		31,713	15,460		36,622	454	12	84		1	37,077
30 Customer Revenue	2,565,779	597,370		301,593	147,025		313,485	4,582	9,520	30,523		180,462	498,529
31													
32 Energy Rate	\$0.0246	\$0.0260		\$0.0360	\$0.0570		\$0.0175	\$0.0189	\$0.0027	\$0.0043		\$0.0000	
33 Billing Units	375,093,610	65,849,375		24,955,351	20,847,715		339,316,393	17,794,167	16,705,500	95,060,824		1,890,000	359,000,581
34 Energy Revenue	9,227,303	1,714,684		898,393	1,188,320		5,938,037	336,310	45,105	408,762		0	6,274,347
35													
36 Demand rate	\$0.00	\$0.00		\$0.00	\$0.00		\$4.58	\$1.30	\$5.85	\$18.17		\$0.00	
37 Billing Units	0	0		0	0		1,093,426	88,311	28,966	231,409		0	1,181,737
38 Demand Revenue	0	0		0	0		5,007,891	88,804	163,958	3,741,884		0	5,098,695
39													
40 Total Unbundled Revenue	11,793,082	2,312,053		1,199,986	1,335,344		11,259,413	429,696	218,283	4,181,168		180,462	11,869,571
41													
42 LESS Cares Discount	213,114	40,588											253,702
43 TOTAL BILLED	11,579,968	2,271,465											13,851,433
44 X Book to Bill Adjustment	0.995376	0.995376		0.995376	0.995376		0.995376	0.995376	0.995376	0.995376		0.995376	
45 = Book Revenue Produced	11,526,418	2,260,961		1,194,437	1,329,169		11,207,346	427,709	217,273	4,181,833		179,628	32,504,774
46													
47 Total revenue	31,493,862	5,998,094		2,203,502	2,644,042		29,250,010	1,146,931	889,458	8,096,936		216,294	81,939,129
48 less Production Capacity	12,858,298	2,408,738		635,471	827,870		11,545,739	383,875	371,383	2,171,540		0	31,202,913
49 less Production Energy	7,106,611	1,331,278		374,326	487,658		6,507,864	332,176	301,642	1,763,751		36,667	18,241,772
50 Total Unbundled Cost	11,528,953	2,258,078		1,193,705	1,328,514		11,196,608	430,880	216,434	4,161,645		179,627	32,484,443
51													
52													
53													
54 Over/(Under) Collection (Due to Rounding)	(2,535)	2,884	349	731	655	1,387	10,738	(3,171)	840	188	1,028	0	10,330

Citizens Utilities, Inc.
Arizona Electric Division

Tabulation of Phased Rate Plan

Unbundled Rates and Resulting Revenues (Excludes Production)

	RESMO	RESSC	TotRes	SGSMO	SGSSC	TotSGS	LGS	IPS	69KV/LPS	<69KV/LPS	TotLPS	LTG	TOTAL
1	Billing Units												
2	NO. OF BILLS	485,943	112,499	598,442	0	0	0	454	12	84	96	1	682,788
3	DEMAND	0	0	0	0	0	0	68,311	28,966	231,409	260,375	0	1,422,112
4	ENERGY	375,093,610	65,949,375	441,042,985	24,955,351	20,847,715	339,316,393	17,794,167	16,705,500	95,080,824	111,786,324	1,890,000	957,612,936
5													
6													
7													
8	Present Rates												
9	Customer, \$/Customer/Mont	\$5.28	\$5.31	\$9.51	\$9.51	\$9.51	\$8.56	\$10.10	\$793.32	\$363.37		\$180,462.04	
10	Demand, \$/KW	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4.580	\$1.300	\$5.650	\$16.170		\$0.0000	
11	Energy, \$/KWh	\$0.02460	\$0.02600	\$0.05700	\$0.05700	\$0.05700	\$0.01750	\$0.01890	\$0.00270	\$0.00430		\$0.0000	
12	Billed Revenue	11,793,082	2,312,053	14,105,135	1,335,344	1,335,344	11,259,413	428,696	218,283	4,181,168		180,462	
13	less CARES Discount	213,114	40,568	253,702									
14	Billed Rev Net of CARES	11,579,968	2,271,485	13,851,453	1,335,344	2,535,330	11,259,413	428,696	218,283	4,181,168	4,399,451	180,462	32,655,785
15													
16													
17	Step 1, 1/1/99												
18	Customer, \$/Customer/Mont	\$10.09	\$10.12	\$16.08	\$16.08	\$16.08	\$8.32	\$10.91	\$708.23	\$324.20		\$203,336.53	
19	Demand, \$/KW	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$6.430	\$1.770	\$4.730	\$14.090		\$0.0000	
20	Energy, \$/KWh	\$0.01860	\$0.01970	\$0.02710	\$0.04290	\$0.04290	\$0.01330	\$0.01430	\$0.00210	\$0.00330		\$0.0000	
21	Billed Revenue	11,879,908	2,437,693	14,317,599	1,186,239	1,142,964	11,848,333	380,317	180,589	3,601,486		203,337	
22	less CARES Discount	213,114	40,568	253,702									
23	Billed Rev Net of CARES	11,666,792	2,397,104	14,063,896	1,186,239	2,329,203	11,848,333	380,317	180,589	3,601,486	3,782,076	203,337	32,607,161
24	Cumulative Increase	0.75%	5.53%	1.53%	-1.15%	-14.41%	5.23%	-11.45%	-17.27%	-13.86%	-14.03%	12.68%	-0.15%
25													
26	Step 2, 1/1/2000												
27	Customer, \$/Customer/Mont	\$14.91	\$14.92	\$22.65	\$22.65	\$22.65	\$8.07	\$11.73	\$623.15	\$285.02		\$271,959.97	
28	Demand, \$/KW	\$0.01260	\$0.01330	\$0.00	\$0.00	\$0.00	\$8.280	\$2.240	\$3.820	\$12.020		\$0.0000	
29	Energy, \$/KWh	\$0.01260	\$0.01330	\$0.00	\$0.00	\$0.00	\$0.00910	\$0.00960	\$0.00160	\$0.00240		\$0.0000	
30	Billed Revenue	11,971,590	2,555,612	14,527,201	1,174,988	950,583	12,436,887	329,162	144,857	3,033,624		271,960	
31	less CARES Discount	213,114	40,568	253,702									
32	Billed Rev Net of CARES	11,758,475	2,515,024	14,273,499	1,174,988	950,583	12,436,887	329,162	144,857	3,033,624	3,178,481	271,960	32,515,560
33	Cumulative Increase	1.54%	10.72%	3.05%	-2.08%	-28.61%	10.46%	-23.40%	-33.64%	-27.45%	-27.75%	50.70%	-0.12%
34													
35	Step 3, 1/1/2001												
36	Customer, \$/Customer/Mont	\$19.72	\$19.73	\$29.22	\$29.22	\$29.22	\$7.88	\$12.54	\$538.06	\$245.85		\$340,583.42	
37	Demand, \$/KW	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$10.130	\$2.700	\$2.900	\$9.940		\$0.0000	
38	Energy, \$/KWh	\$0.00660	\$0.00700	\$0.00940	\$0.01470	\$0.00500	\$0.00480	\$0.00500	\$0.00100	\$0.00140		\$0.0000	
39	Billed Revenue	12,058,414	2,681,251	14,739,665	1,161,242	758,205	12,991,875	279,100	107,164	2,453,942		340,583	
40	less CARES Discount	213,114	40,568	253,702									
41	Billed Rev Net of CARES	11,845,300	2,640,683	14,485,983	1,161,242	758,205	12,991,875	279,100	107,164	2,453,942	2,561,106	340,583	32,578,070
42	Cumulative Increase	2.29%	16.25%	4.58%	-3.23%	-43.22%	15.39%	-35.05%	-50.91%	-41.31%	-41.79%	88.73%	-0.24%
43													
44	Step 4, 1/1/2002												
45	Customer, \$/Customer/Mont	\$24.53	\$24.53	\$35.79	\$35.79	\$35.79	\$7.58	\$13.35	\$452.97	\$206.67		\$409,206.66	
46	Demand, \$/KW	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$11.990	\$3.170	\$1.980	\$7.860		\$0.0000	
47	Energy, \$/KWh	\$0.00662	\$0.00682	\$0.00958	\$0.00568	\$0.00568	\$0.00061	\$0.00039	\$0.00041	\$0.00041		\$0.0000	
48	Billed Revenue	12,152,740	2,800,489	14,953,229	1,149,491	565,405	13,583,822	229,542	69,638	1,875,210		409,207	
49	less CARES Discount	213,114	40,568	253,702									
50	Billed Rev Net of CARES	11,939,626	2,759,901	14,699,527	1,149,491	565,405	13,583,822	229,542	69,638	1,875,210	1,944,848	409,207	32,581,841
51	Cumulative Increase	3.11%	21.50%	6.12%	-4.21%	-57.66%	20.84%	-46.88%	-68.10%	-55.15%	-55.79%	126.76%	-0.23%

1/10/97	RESMO	RESSC	TotRes	SGSMO	SGSSC	TotSGS	LGS	IPS	TotComm	LPS	LTG	TOTAL
NO. OF BILLS	475,827	110,927	586,754	31,137	15,232	46,369	36,622	454	83,445	87	0	670,286
DEMAND	0	0	0	0	0	0	1,093,426	68,311	1,161,737	236,047	0	1,397,784
ENERGY	367,279,000	65,016,000	432,295,000	22,785,271	19,958,344	42,743,615	339,316,393	17,794,167	399,854,176	97,076,824	1,890,000	931,116,000
Current Rates												
Customer Chg	\$6.50	\$6.50		\$10.00	\$10.00		\$10.00	\$10.00		\$365.00		
Energy Chg	0.0759	0.0809		0.0754	0.1194		0.0544	0.0544		0.0245		
Demand Chg	0	0			\$9.50		\$9.50	\$2.50		\$24.75		
TOTAL BILL REV	30,969,352	5,980,820	36,950,172	2,029,382	2,535,346	4,564,728	29,212,580	1,143,317	34,920,625	8,252,300	216,089	80,339,186
Multiplier	0.9925	0.9925		0.9925	0.9925		0.9925	0.9925		0.9925	0.9925	
Schedule H1 and	30,736,330	5,935,819	36,672,149	2,014,112	2,516,270	4,530,382	28,992,777	1,134,714	34,657,873	8,190,208	214,463	79,734,693
Sch C Revenue												= Sch C Rev less
												Other and PPFA
Proposed Rates												
Customer Chg	\$6.50	\$6.50	\$6.50	\$10.00	\$10.00		\$10.10	\$10.10		\$365,000		
Energy Chg	\$0.07650	\$0.08090	\$0.08090	\$0.07600	\$0.12000		\$0.05490	\$0.05490		\$0.02500		
Demand Chg							\$9.50	\$2.50		\$24,75000		
TOTAL BILL REV	31,189,719	5,980,820	37,170,539	2,043,053	2,547,321	4,590,374	29,385,900	1,152,259	35,128,534	8,300,839	217,299	80,817,211
TOTAL BOOK REV	30,955,039	5,935,819	36,890,858	2,027,680	2,528,155	4,555,835	29,164,793	1,143,589	34,864,218	8,238,381	215,664	80,209,121
Percent Increase	0.712%	0.00%	0.596%	0.67%	0.47%	0.56%	0.59%	0.78%	0.60%	0.59%	0.560%	0.595%
Increase	218,709	0	218,709	13,568	11,885	25,453	172,016	8,875	206,345	48,173	1,201	
												Total Increase =
												474,428

Citizens Utilities, Inc.
Arizona Electric Division

Derivation of Booked Revenue and Allocation Factor Multipliers

	RESMO	RESSC	TotRes	SGSMO	SGSSC	TotSGS	LGS	IPS	TotComm	LPS	LIG	TOTAL
1	Per Rate Design Worksheets											
2	NO. OF BILLS	110,927	586,754	31,137	15,232	46,369	36,622	454	83,445	87	0	670,286
3	DEMAND	0	0	0	0	0	1,093,426	68,311	1,161,737	236,047	0	1,397,784
4	ENERGY	65,016,000	432,295,000	22,785,271	19,958,344	42,743,615	339,316,393	17,794,167	399,854,176	97,076,824	1,890,000	931,116,000
5												
6	Current Rates	\$6,500		\$10.00	\$10.00		\$10.10	\$10.10		\$365,000		
7	Customer Chg	\$0.07650		\$0.07600	\$0.12000		\$0.05490	\$0.05490		\$0.02500		
8	Energy Chg	\$0.08090					\$9.50	\$2.50		\$24,75000		
9	Demand Chg											
10												
11	BOOK REV	5,935,819	36,890,858	2,027,681	2,528,155	4,555,835	29,164,793	1,143,589	34,864,218	8,238,381	215,664	80,209,121
12	BILLED REV	5,980,820	37,170,539	2,043,053	2,547,321	4,590,374	29,385,900	1,152,259	35,128,534	8,300,839	217,299	80,817,211
13	Book/Bill Adj											
14												
15	Adjustments Approved by ACC											
16	NO. OF BILLS	1,572	11,688	576	228	804	0	0	804	9	0	12,501
17	DEMAND	0	0	0	0	0	0	0	0	24,328	0	24,328
18	ENERGY	933,375	8,747,985	2,170,080	889,371	3,059,451	0	0	3,059,451	14,689,500	0	26,496,936
19	BOOK REV	83,908	727,552	188,481	86,681	275,162	0	0	275,162	727,294	-	1,730,008
20	BILLED REV	84,544	733,068	189,910	87,338	277,248	0	0	277,248	732,808	0	1,743,124
21												
22												
23	Pro Forma Billing Data											
24	NO. OF BILLS	112,499	598,442	31,713	15,460	47,173	36,622	454	84,249	96	0	682,787
25	DEMAND	0	0	0	0	0	1,093,426	68,311	1,161,737	260,375	0	1,422,112
26	ENERGY	65,949,375	441,042,985	24,955,351	20,847,715	45,803,066	339,316,393	17,794,167	402,913,627	111,766,324	1,890,000	957,612,936
27	BOOK REV	6,019,727	37,618,410	2,216,162	2,614,836	4,830,997	29,164,793	1,143,589	35,139,380	8,966,675	215,664	81,939,129
28	BILLED REV	6,065,364	37,903,607	2,232,963	2,634,659	4,867,623	29,385,900	1,152,259	35,405,782	9,033,647	217,299	82,560,334
29												
30												
31	Percentage Multiplier	1.021260	1.019920	1.018499	1.014968	1.017339	1.000000	1.000000	1.009635	1.103448		1.018650
32	NO. OF BILLS											1.017405
33	DEMAND	1.014356	1.020236	1.095240	1.044561	1.071577	1.000000	1.000000	1.007651	1.151318	1.000000	1.028457
34	ENERGY	1.021277	1.019722	1.092954	1.034286	1.060398	1.000000	1.000000	1.007892	1.088281	1.000000	1.021569
35	BOOK REV	1.020793										

Citizens Utilities, Inc.
Arizona Electric Division

Page 15 of 17

Ad West Revenue Caculations

	Customer	Demand	Energy	Total
1 Ad West 3 Mos. In Test Year	3	4,638	2,016,000	
2 LPS Rate	375	24.01	0.02255	
3 69kV Contract rate	800	16.10	0.02450	
4 Decrease	-425.00	7.91	-0.00195	
5 Booked to Billed Difference	(1,275)	36,687	(3,931)	31,480
6				
7				
8	Customer	Demand	Energy	Total
9 Ad West Annualized Test Year	12	28,966	16,705,500	
10 Billed Revenue per LPS Rate	365	24.75	0.02500	
11 Booked revenue per 69kV Contract rate	800	16.10	0.02450	
12 Decrease	-435.00	8.65	0.00050	
13 Booked to Billed Difference	(5,220)	250,556	8,353	253.689
14				

Citizens Utilities, Inc.
Arizona Electric Division
Analysis of Purchased Power

Page 16 of 19

	Description	As Filed	Staff Adjusted	ACC Ordered
1	Total sales, kWh	931,112,000	961,383,000	957,612,936
2				
3				
4	Purchased Power Costs	48,590,222	49,933,478	49,792,438
5				
6				
7	Unit Cost	0.05219	0.05194	0.05200
8				
9				
10				
11				
12	ACC Approved Test Year Adjusted Sales			957,612,936
13				
14	ACC Approved Base Level for PPFAC			0.05194
15				
16	Base Energy Costs recovered in rates			49,737,664
17				
18	Allowed Energy Costs			49,792,438
19				
20	Over/ (Under) Collection			(54,774)

Rate Design Worksheets

ARIZONA ELECTRIC DIVISION

RATE DESIGN WORKSHEET FROM PREVIOUS RATE CASE (Developed Based on Billed Ratio)

MOHAVE		PUBLIC AUTHORITIES										IRRIGATION			LIGHTING		OTHER		TOTAL
RESIDENTIAL		COMMERCIAL			INDUSTRIAL			PUBLIC AUTHORITIES				IRRIGATION		LIGHTING		OTHER		TOTAL	
	RES	SGS	LGS	TOTAL	LGS	LPS	TOTAL	SGS	LGS	IRS	TOTAL	SGS	IPS	TOTAL	LTG	DUAL&ADWST	LPS	TOTAL	TOTAL
TARIFF																			
NO. OF BILLS	475,827	29,784	26,169	55,953	125	72	197	1,353	2,021	270	3,644	160	160	160		24	15	39	535,820
DEMAND				55,953			209	1,184	1,768										
BILLED																			
METERED																			
ENERGY																			
BILLED																			
METERED																			
TARIFFS																			
CUSTOMER																			
DEMAND																			
ENERGY																			
DISCOUNT																			
CALC. REV.	30,969,352	1,864,916	16,495,297	18,390,212	1,161,121	7,663,940	8,825,080	134,466	2,602,050	1,008,250	3,744,767	55,507	55,507	55,507	54,755	79,559	588,361	687,920	82,707,573
ADJ. FACT	0.9938	0.9954	0.9954	0.9954	0.9613	0.9613	0.9613	0.9918	0.9918	0.9918	0.9918	0.7949	0.7949	0.7949		0.9687	0.9687	0.9687	0.9681
ACT. REV.	30,776,055	1,869,268	16,419,889	18,305,265	1,116,208	7,367,492	8,453,700	133,364	2,580,714	999,883	3,714,080	44,122	44,122	44,122	54,755	77,072	569,862	647,034	82,025,991

SANTA CRUZ		COMMERCIAL				INDUSTRIAL				PUBLIC AUTHORITIES				IRRIGATION				LIGHTING		OTHER		TOTAL
RESIDENTIAL	RES	SGS	LGS	TOTAL	LGS	LPS	TOTAL	SGS	LGS	IRS	TOTAL	SGS	IPS	TOTAL	LTG							
TARIFF																						
NO. OF BILLS	110,927	12,907	7,494	20,401	168	0	168	1,811	645		2,456	514		514				134,466				
DEMAND				21,360							2,208							319,471				
BILLED																		0				
METERED			223,349	223,349	50,159		50,159		45,983		45,983							0				
ENERGY	65,016,000	16,734,606	65,998,394	82,733,000	23,646,000		23,646,000	2,085,738	17,634,262		19,730,000	1,128,000		1,128,000	1,394,000			193,649,000				
BILLED				82,733,000							19,730,000							0				
METERED																						
TARIFFS																						
CUSTOMER	\$6.50	\$10.00			\$10.00		\$365.00	\$10.00	\$10.00			\$10.00	\$10.00					\$2.50				
DEMAND	\$9.50	\$24.75			\$9.50		\$24.75	\$0.1194	\$0.0544			\$0.1194	\$0.0544					\$0.0544				
ENERGY	\$0.0809	\$0.1194			\$0.0544		\$0.0245															
DISCOUNT																						
CALC. REV.	5,980,820	2,127,182	5,787,068	7,914,250	1,764,642	0	1,764,642	268,341	1,402,402	0	1,670,743	139,823	0	139,823	161,334			17,631,612				
ADJ. FACT	0.9887	1.0146	1.0146	1.0146	1.0176		1.0176	1.0005	1.0005		1.0005	0.9839		0.9839				1.0044				
																		1,0044				
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ACT REV.*		5,912,854		4,139,119		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,456		3,611,45	
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Citizens Utilities, Inc.
Arizona Electric Division

Development of Transmission Revenues

	RESMO	RESSC	TotRes	SGSMO	SGSSC	TotSGS	LGS	IPS	69KV LPS	<69KV LPS	TotLPS	LTG	TOTAL
1 NO. OF BILLS	485,943	112,499	598,442	31,713	15,460	47,173	36,622	454	12	84	96	1	682,788
2 DEMAND	0	0	0	0	0	0	1,093,426	68,311	28,966	231,409	260,375	0	1,422,112
3 ENERGY	375,093,610	65,949,375	441,042,985	24,955,351	20,847,715	45,803,066	339,316,393	17,794,167	16,705,500	95,060,824	111,766,324	1,890,000	957,612,936
4													
5 Single Coincident Peak Demand	85,889	15,101	100,990	5,049	4,218	9,267	77,855	2,612	0	15,079	15,079	0	205,803
6 Allocated to sub-class	1,021,2770	1,014,3561	1,020,2361	1,095,2405	1,044,5614	1,071,5768	1,000,0000	1,000,0000	3,080	15,079	18,159	0	211,596
7 Sales Annualization factor	87,716	15,318	103,034	5,530	4,406	9,936	77,855	2,612	3,080	15,079	18,159	0	219,271
8 Adjusted CP's @ Meter	90,898	15,873	106,771	5,730	4,566	10,296	80,679	2,707	3,080	15,915	19,860	0	231,420
9 Adjusted to Primary	95,934	16,753	112,687	6,048	4,819	10,867	85,149	2,857					
10 Adjusted to Transmission													
11 To recognize coincidence,													
12 Factored to Test Year CP	98,788	17,248	116,016	6,227	4,961	11,188	87,864	2,941	3,171	16,385	20,447	0	238,256
13 FERC Rate, \$/KW-yr	\$15.60	\$15.60	\$15.60	\$15.60	\$15.60	\$15.60	\$15.60	\$15.60	\$15.60	\$15.60	\$15.60	\$15.60	\$15.60
14 Est Rev from FERC Rate	1,540,783	269,068	1,809,849	97,138	77,392	174,528	1,387,983	45,881	49,487	255,600	318,972	0	3,716,794

Citizens Utilities
Arizona Electric Division

Summary of CARES Program Data

	Lower Limit	Upper Limit	Discount Percent	April 1994	May 1994	June 1994	July 1994	August 1994	September 1994	October 1994	November 1994	December 1994	January 1995	February 1995	March 1995	Total
1	No of Bills															
2	0	300	30.00%	1,696	1,844	1,573	1,238	1,296	1,333	1,735	2,105	1,798	1,486	1,687	1,770	19,561
3	301	600	20.00%	1,044	1,016	1,086	1,104	982	1,053	1,163	1,045	1,030	1,017	1,025	1,037	12,602
4	601	1000	10.00%	395	336	490	626	674	637	461	358	471	509	454	391	5,802
5	1001		0.00%	89	78	235	457	539	472	231	109	354	399	246	132	3,341
6		TOTAL		3,224	3,274	3,384	3,425	3,491	3,495	3,590	3,617	3,653	3,411	3,412	3,330	41,306
9	Total kWh															
10	0	300	30.00%	211,741	230,969	172,820	96,963	100,669	105,782	176,009	236,396	169,294	152,081	193,914	211,284	2,057,922
11	301	600	20.00%	446,362	430,386	473,447	492,991	438,377	470,398	503,906	444,472	445,444	441,415	438,964	438,133	5,464,295
12	601	1000	10.00%	301,630	256,032	372,226	475,719	521,152	481,523	352,087	269,742	361,946	387,881	349,621	296,445	4,426,004
13	1001		0.00%	111,161	98,765	335,570	779,203	931,854	817,463	318,411	138,262	537,130	582,823	348,146	173,641	5,172,429
14		TOTAL		1,070,894	1,016,152	1,354,063	1,844,876	1,992,052	1,875,166	1,350,413	1,088,872	1,513,814	1,564,200	1,330,645	1,119,503	17,120,650
17	Avg kWh per Bill															
18	0	300	30.00%	125	125	110	78	78	79	101	112	94	102	115	119	105
19	301	600	20.00%	428	424	436	447	446	447	433	425	432	434	428	423	434
20	601	1000	10.00%	764	762	760	760	773	756	764	753	768	762	770	758	763
21	1001		0.00%	1,249	1,266	1,428	1,705	1,729	1,732	1,378	1,268	1,517	1,461	1,415	1,315	1,548
22		TOTAL		332	310	400	539	571	537	376	301	414	459	390	336	414
17	Discount Amount															
18	0	300	30.00%	\$7,033.34	\$7,730.20	\$5,714.79	\$3,229.35	\$3,379.77	\$3,513.98	\$5,844.31	\$7,948.58	\$5,682.11	\$5,095.23	\$6,485.64	\$7,061.99	\$68,719.29
19	301	600	20.00%	\$8,307.38	\$8,012.01	\$8,746.20	\$9,195.45	\$8,075.75	\$8,776.14	\$9,325.82	\$8,293.21	\$8,262.55	\$8,226.59	\$8,106.55	\$8,188.90	\$101,516.55
20	601	1000	10.00%	\$2,606.65	\$2,178.04	\$3,203.46	\$4,207.03	\$4,462.34	\$4,237.78	\$3,006.51	\$2,337.23	\$3,115.12	\$3,410.42	\$2,981.42	\$2,542.49	\$38,288.49
21	1001		0.00%	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
22		TOTAL		\$17,947	\$17,920	\$17,664	\$16,632	\$15,918	\$16,528	\$18,177	\$18,579	\$17,060	\$16,732	\$17,574	\$17,793	\$208,524
25	Average Discount per Bill															
26	0	300	30.00%	\$4,147	\$4,192	\$3,633	\$2,609	\$2,608	\$2,636	\$3,368	\$3,776	\$3,160	\$3,429	\$3,844	\$3,990	\$3,513
27	301	600	20.00%	\$7,957	\$7,886	\$8,054	\$8,329	\$8,224	\$8,334	\$8,019	\$7,936	\$8,022	\$8,089	\$7,909	\$7,897	\$8,056
28	601	1000	10.00%	\$6,599	\$6,482	\$6,538	\$6,720	\$6,621	\$6,653	\$6,522	\$6,529	\$6,814	\$6,700	\$6,567	\$6,503	\$6,599
29	1001		0.00%	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
30		TOTAL		\$5,567	\$5,474	\$5,220	\$4,856	\$4,560	\$4,729	\$5,063	\$5,137	\$4,670	\$4,905	\$5,151	\$5,343	\$5,048

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